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STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

FILED

JUL 11 2003

In the Matter of the Petition of Indiana Bell)
Telephone Company, Incorporated d/b/a)
Ameritech Indiana, Pursuant to I.C. 8-1-2-61,)
for a Three-Phase Process for Commission)
Review of Various Submissions of Ameritech)
Indiana to Show Compliance with Section 271(c))
of the Telecommunications Act of 1996)

INDIANA UTILITY
REGULATORY COMMISSION

Cause No. 41657

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**REPORT OF SBC INDIANA ON ISSUES
IDENTIFIED IN JULY 2, 2003 COMPLIANCE ORDER**

INDIANA UTILITY REGULATORY COMMISSION
TELECOMMUNICATIONS DIVISION

Indiana Bell Telephone Company Incorporated d/b/a SBC Indiana ("SBC Indiana") comes now, by counsel, and makes the following filing in response to the July 2, 2003 Compliance Order issued by the Commission in this Cause.¹

The Compliance Order makes preliminary findings that the Commission has identified areas of concern that have a bearing on the Commission's support of SBC Indiana's Section 271 application to the FCC. The Order "provides notice to SBC Indiana that attention is needed to facilitate the company's efforts to gain the Commission's endorsement of its Section 271 application with the FCC."² It then concludes that the Commission is prepared to support SBC Indiana's application to the FCC pending resolution of these matters. The Order directs SBC Indiana to address the issues identified in Attachment One to the Order and file a report with the Commission within 10 days of the July 2, 2003 Order on its efforts to resolve these issues. The following constitutes SBC Indiana's report to the Commission that fully addresses and resolves each of these issues.

¹ Cause No. 41657, July 2, 2003 Compliance Order.

² Id. at 12.

SBC Indiana Compliance and Improvement Plans

Attachment One to the Order provides as follows:

On March 18, 2003 SBC Indiana filed with this Commission in Cause No. 41657 a document entitled, SBC Indiana's Notice of Filing of Certain Compliance and Improvement Plans, which described such Compliance and Improvement Plans as SBC had filed in Michigan on or before March 13, 2003, and proposed to file in Indiana. Subsequent to the filing of that Notice, the Michigan Public Service Commission ordered additional changes to three of the plans, and SBC Michigan filed revised versions of those three plans, dated April 2, with the Michigan PSC. SBC filed all seven plans in Illinois on May 1, 2003 (the "Illinois Plans"). The IURC believes that the most recent versions of these plans, as filed in Illinois, and subject to the modifications described below, will provide benefits to CLECs; will advance this proceeding; and will assist SBC in meeting the criteria for entry into intrastate, interLATA services under Section 271 of TA-96.³

Attached hereto are the Indiana-specific versions of the seven Illinois plans ordered by the Commission, with the modifications described in Attachment One of the Compliance Order to the Special Circuits Repair Coding Accuracy Plan and the Billing Auditability and Dispute Resolution Plan, to the extent those changes were not reflected in the Illinois Plans. The plans, by the type of classification for Indiana (Compliance, Improvement, or Informational), being filed herewith are as follows:

- | | |
|---|---|
| 1. Customer Service Inquiry Accuracy and Delivery | Informational |
| 2. Pre-Order Processing Timeliness | Improvement |
| 3. Line Loss Notifier Communications | Improvement |
| 4. Directory Listing and Directory Assistance Databases | Informational |
| 5. Billing Auditability and Dispute Resolution | Improvement |
| 6. Special and UNE Circuit Repair Coding Accuracy- | Compliance (Special Circuit) and
Informational (UNE) |
| 7. Change Management Communications | Improvement |

SBC Indiana also agrees, the extent it has not done so, that it will also implement all of the Indiana-specific versions of the Illinois plans. The reporting requirements for the Indiana

³ Compliance Order, Attachment One, p. 1.

Plans on a going-forward basis shall be consistent with the reporting requirements for the Illinois Plans. In the near future, SBC Indiana will submit the past reports prepared since the Plans were implemented in Michigan that have been filed with the ICC and the MPSC. Further, SBC Indiana agrees to use BearingPoint as the independent third party auditor for the Special Circuit Repair Coding Accuracy Compliance Plan as described in Attachment One. SBC Indiana has advised BearingPoint of the need to develop its own proposed methodology for testing SBC Indiana's compliance with the applicable corrective actions and to provide this methodology to the Commission within 10 days of the Compliance Order.

Performance Audit Completion

The Compliance Order provides that the BearingPoint PMR test is to continue, and SBC Indiana shall continue to work with BearingPoint to address findings as they are raised. As the Compliance Order requires, SBC Indiana agrees to use its best efforts to facilitate the completion of BearingPoint's PMR testing by October 31, 2003.

SBC Indiana Section 271 Remedy Plan

Finally, the Commission found that the SBC-Time Warner remedy plan, approved in Cause No. 40572-INB-162 on January 15, 2003, modified as described in Attachment One, satisfactorily addresses the Commission's objective of assuring that the Indiana local exchange market remains open to competition for the purposes of its Section 271 application. SBC Indiana attaches hereto the SBC Indiana Section 271 Remedy Plan Amendment, which is the SBC Indiana - Time Warner Remedy Plan Amendment modified as directed by the Compliance Order Attachment One. This SBC Indiana Section 271 Remedy Plan

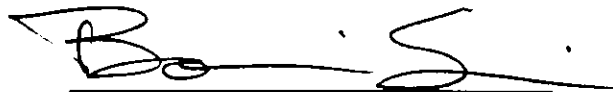
Amendment has been posted on the CLEC Online and is now available to CLECs.⁴ While the Compliance Order is clear that it is not intended to disturb the agreements reached between Time Warner and SBC Indiana in Cause No. 40572-INB-162, SBC Indiana has offered to make the same modifications to the SBC Indiana - Time Warner Remedy Plan Amendment

Conclusion

With this filing, SBC Indiana has addressed and resolved the areas identified in the July 2, 2003 Compliance Order. Based upon this compliance report and the Commission's extensive and thorough three year investigation, SBC Indiana is confident that the record assembled in this Cause fully supports a positive recommendation by the Commission of SBC Indiana's Section 271 application to the Federal Communications Commission.

Dated this 11th day of July, 2003

Respectfully Submitted,



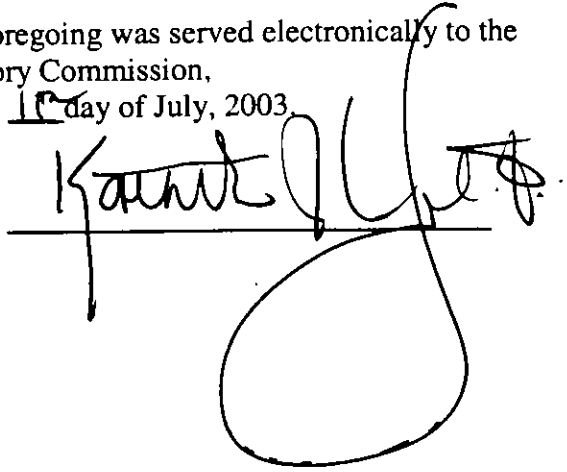
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⁴ Accessible Letter CLECAM 03-245, available at <https://clec.sbc.com/clec/acclatters/home.cfm>

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically to the list serve maintained by the Indiana Utility Regulatory Commission, Ameritech271@urc.state.in.us, in this Cause, on the 10 day of July, 2003.

A handwritten signature, appearing to be "K. J. [unclear]", is written over a horizontal line. Below the line is a large, loopy flourish that extends downwards and to the right.



IURC Cause No. 41657

Customer Service Inquiry Accuracy Plan

July 11, 2003

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JUL 11 2003

**INDIANA UTILITY REGULATORY COMMISSION
TELECOMMUNICATIONS DIVISION**

CSI Accuracy Plan

TABLE OF CONTENTS

1. **PURPOSE** 1

2. **ISSUE DEFINITION** 1

3. **ROOT CAUSE ANALYSIS** 2

4. **ACTIONS** 3

5. **THIRD PARTY EXAMINATION APPROACH**..... 6

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CSI Accuracy Plan

1. Purpose

The purpose of this plan is to describe the actions the Indiana Bell Telephone Company ("SBC" or "SBC Indiana") proposes to take to improve certain aspects of Customer Service Inquiry ("CSI") accuracy.¹

This plan was developed to address a Not Satisfied test point in the SBC Michigan third party Operations Support Systems ("OSS") Test Report issued by BearingPoint on October 30, 2002. This same test point was rated as Satisfied in Indiana by BearingPoint with the disposition report for Exception 34 dated August 2, 2002. Nevertheless, SBC is submitting this plan in Indiana as the improvements brought about by this plan will also have a positive impact on Indiana CSI accuracy since these tasks and systems are regional in nature, and are not state specific.

The Michigan Plan (upon which this Indiana plan is based) was developed pursuant to the Michigan Public Service Commission's ("MPSC's") Order issued January 13, 2003, in Case No. U-12320 (SBC's §271 Checklist Compliance Docket) as result of extensive discussion with MPSC staff and CLEC Industry Collaborative. SBC has retained BearingPoint to evaluate SBC's implementation of this plan. On March 26, 2003 the MPSC approved this plan as submitted on March 13, 2003.

2. Issue Definition

BearingPoint, Inc. (f/k/a KPMG Consulting) first raised this issue in Indiana in Exception 34 as part of the Third Party Operations Support Systems ("OSS") testing on January 28, 2002 stating that they have observed instances where SBC has failed to accurately update the Customer Service Inquiry ("CSI") records. In this test, information contained within the Customer Service Record ("CSR") extract returned by a Customer Service Inquiry was evaluated for accuracy against field inputs from submitted Test CLEC orders, i.e., Local Service Requests ("LSRs"). In the course of evaluating this issue, BearingPoint retested CSI accuracy two times over an eight month period. BearingPoint's February 28, 2003 Indiana OSS Evaluation Project Report at p.947 found that test criteria for TVV4-27 was "satisfied".

¹ While the MPSC ordered the implementation of this plan to further improve its accuracy of updating the customer service record, the MPSC was clear, however, that the plan is not required to demonstrate that SBC is "... in compliance with each of the Section 271 competitive checklist items, including each of the areas addressed by the modified compliance and improvement plans." (MPSC Order, March 26, 2003, Case No. U-12320, page 2.)

CSI Accuracy Plan

During the course of BearingPoint's evaluation, SBC implemented system modifications and process improvements that improved tested performance in Michigan from 87% to 92%; the MPSC found the difference between 92% and the 95% benchmark selected by BearingPoint was not indicative of discriminatory behavior². BearingPoint obtained similar results in its Indiana testing, reporting a 96.8% success rate. SBC believes that the remaining errors identified in the OSS test are either immaterial in terms of billing or provisioning, or are associated with product ordering scenarios not widely seen in the commercial environment.

3. Root Cause Analysis

The process for updating a customer service record begins when a CLEC submits a local service request through the EDI or GUI interfaces, or via fax, to migrate, install, convert, change or disconnect network elements or services. These LSRs are further processed by SBC's internal Local Service Center ("LSC") systems or service representatives, where service orders internal to SBC are created. These service orders travel further to downstream processing systems. When provisioning work is completed, SBC creates and stores an updated CSR in the SBC Midwest Customer Information System ("ACIS"). A CLEC may obtain access to a CSR by issuing a customer service inquiry using the Verigate, EDI or CORBA interfaces.

BearingPoint conducted two separate CSI accuracy tests for Indiana over an eight month period. During these two test iterations, BearingPoint frequently reported interim results. In keeping with the "military style" nature of the OSS test, these tests were executed in a serial fashion, with each succeeding test validating the changes made by SBC to correct the failures of previous tests. Therefore, all failure points from the earlier CSI accuracy testing that was not identified by BearingPoint in its report of the final testing can be considered properly corrected by SBC and validated by BearingPoint. Accordingly, SBC's root cause analysis will focus on the remaining failure points of the third Michigan test.²

The results of the third CSI accuracy test in Michigan, as reported by BearingPoint, show some Resale and UNE-P orders failing to accurately update the post-completion CSR. In its analysis of these results, SBC determined that the primary cause of CSI inaccuracies was errors on manual handling. In these situations, the data on the CLEC-submitted LSR was not accurately input on the internal service order by the SBC service representative.

² MPSC Report, January 13, 2003, pg. 67 – "[T]he Commission does not believe that the amount by which the benchmark has been missed is of a level of significance to indicate discriminatory behavior on the part of SBC and failure of an opportunity to provide CLECs a reasonable opportunity to compete."

CSI Accuracy Plan

Any inaccuracy on the service order may be reflected in the ACIS CSR database when the database is updated upon order completion or may delay the update of the CSR database.

These manually handled service orders are generally associated with the ordering of complex products. CSIs for other products were successfully tested by BearingPoint and, thus, are not addressed in SBC's root cause analysis or action steps. In response to comments raised in the Michigan Industry Collaborative, SBC again reviewed the latest version of the BearingPoint test results for all states including Indiana and confirmed that the only two products that were failing were resale and UNE-P. Furthermore, BearingPoint also successfully tested the EDI and GUI interfaces, as well as the faxed order mechanism, that deliver the LSR information to the Mechanized Order Receipt ("MOR") and Local Access Service Request ("LASR") applications that store this information prior to further processing; therefore the translation of LSR information from these input sources also does not need to be addressed in this plan.³

It is also important to note that a failure in the CSR update process does not imply a failure in provisioning processes or systems. While some failures in the CSI accuracy test resulted in switch features not being updated according to the LSR, the failures were due to manual order process failures, not provisioning process failures. In fact, BearingPoint determined in its evaluation of test criteria TVV4-2 and TVV4-24 that SBC provisioned and disconnected switch features accurately in Michigan as well as in Indiana.

4. Actions

The plan for CSI Accuracy proposed by SBC Michigan initially in its October 30 Filing was constructed to address the reliability and accuracy of manual service orders. The plan included the development and delivery of a quality awareness training package to the hundreds of SBC service representatives that handle CLEC service orders. Additionally, it called for the implementation of a service order quality review process consisting of reviews of daily production service orders, corrections of identified errors, and coaching and/or process/system improvements based on data gathered from the review process.

The MPSC in its January 13 Order indicated that the CSI Accuracy plan should be expanded, to the extent possible, to address the specific comments of AT&T. In reference to the CSI Accuracy plan, AT&T made recommendations regarding the content of the service representative training package, the period of the training, the scope of the quality improvement effort, the commitment by SBC to fix errors identified as part of its

³ BearingPoint test criterion TVV1-4, which states "SBC Ameritech provides required order functionality," was reported as "not satisfied" in BearingPoint's December 20, 2002 report; however, none of the observations cited in the report for that test criterion were related to LSR translation, and in any case have since been closed successfully.

CSI Accuracy Plan

quality review, the scope of testing beyond UNE-P and resale⁴, and the potential need for a performance measure of CSI Accuracy. SBC has addressed the requirements of the MPSC and responded to the comments of AT&T in the following enhanced plan.

SBC is taking the following steps to improve the accuracy of CSI:

1. Service Representative Training

SBC developed for Local Service Center ("LSC") Service Representatives a Service Order Quality informational package directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during the training of service representatives involved in producing ACIS service orders. This package provides information on the importance of accurate orders, and the impacts of inaccurate orders on CLECs and end-users. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, 2002, and applies across the entire SBC Midwest region.

- Starting in January 2003, service representatives are receiving training using the Service Order Quality informational package.
 - The training is scheduled to be completed by May 31, 2003 with a majority of targeted Service Representatives trained by March 31, 2003.
 - The intended audience for training is service representatives that produce and process Resale and UNE-P service orders for the ACIS system.
 - Review of the package is accomplished in mandatory training sessions facilitated by SBC's Training Department. Logs will be maintained to track attendance and manage attendance compliance.
 - A General Manager, Area Manager or Line Manager will address each class with a list of Talk Points to emphasize management's commitment to this process.

2. CSI Quality Review

- SBC is designing an internal quality review process for CSI accuracy. This review will rely on sampling UNE-P and Resale production service orders that drop to manual handling ("manual-manual" and "auto-manual") to monitor CSI accuracy. The intent of the sampling activity is to assist in identifying potential problem areas in the manual processing of these orders; while SBC initially intends to conduct this sampling activity in a statistically valid manner by randomly selecting 150 orders each month from the total population under review, it may determine the need to modify this activity to meet its ultimate goal: monitoring the effectiveness of its

⁴ As revised, the scope of BearingPoint's analysis of commercial production includes a diverse set of products, and is not limited to UNE-P and resale. This will help determine if additional reasons for errors, beyond those covered in the actions steps in this plan, require further or additional root cause analysis.

CSI Accuracy Plan

training and helping identify potential corrective actions. In fact, as a result of discussions during the March 4 - 5, 2003 Michigan Industry Collaborative session, SBC agreed to augment its sample of 150 orders to include at least 10 complex orders each month.

These quality reviews will be conducted on an ongoing basis. Initially, the reviews are intended to be conducted daily.

- Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision Support System (DSS). DSS is a reporting system used by the LSC to track and capture information on order activity. The DSS system is separate from the systems that process the actual production order.
- The criteria for sampling will include product type and process type. Sampled orders will come from auto-manual and manual-manual orders.
- Quality Assurance ("QA") service representatives, experienced service representatives selected for this purpose, will conduct reviews using methods and procedures developed specifically for this process.
- Potential order discrepancies will be reviewed to:
 - Verify that discrepancies are in fact errors;
 - Correct identified errors;
 - Identify root causes of errors;
 - Provide the basis for individual coaching of service representatives.
- The QA service representatives will compare the CLEC LSR to the corresponding internal service order on a field by field basis. Corrections will be made as necessary.

3. Corrective Actions

- SBC plans to address discrepancies identified during its quality reviews as described above in the following manner:
 - Review results will be documented in a new LSC database to track performance, identify trends, and provide reports for LSC management.
 - Information on the errors and root cause(s) identified will be analyzed using tracked data to ascertain if common issues or trends are apparent.
 - This information will be used to determine whether individual service representative coaching is needed, and/or additional training, changes to processes, methods and procedures, and/or systems are needed. SBC will implement appropriate corrective actions as warranted, including additional training and/or changes to processes or systems.

The following table provides the schedule for the actions discussed in this section:

CSI Accuracy Plan

Task	Begin	End	Status
Quality Assurance-Related Tasks			
1. Develop Service Order Quality informational package and provide training to all LSC UNE-P and Resale Service Representatives.	11/15/02	5/31/03	Complete
A. Determine and assign resource to lead "informational package" development effort	11/15/02	12/31/02	Complete
B. Produce "informational package"	12/01/02	12/31/02	Complete
C. Determine training deployment method	12/01/02	01/06/03	Complete
D. Create training schedule or plan	12/01/02	01/14/03	Complete
E. Conduct training	01/15/03	05/31/03	Complete
2. Design and implement a quality review process for validating the accuracy of the ACIS CSI record updates, which includes both sampling and quality reviews of Unbundled Network Elements – Platform ("UNE-P") and Resale orders.	12/15/02	Ongoing	In progress
A. Design quality review process	12/15/02	1/31/03	Complete
B. Implement daily quality review of Resale and UNE-P orders	02/03/03	Ongoing	In progress
3. Identify root causes of errors identified by quality review and sampling processes	12/15/02	Ongoing	In progress
A. Develop identification and tracking process	12/15/02	2/5/03	Complete
B. Identify training or other 'correcting' opportunities	02/03/03	Ongoing	In progress
C. Implement corrective actions	02/03/03	Ongoing	In progress

5. Third Party Examination Approach

This plan will be evaluated by a third party. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include a process evaluation and a review of actual commercial transactions as follows:

- The third party will evaluate SBC's implementations of the actions described in the "Actions" section of this plan by reviewing documents, conducting interviews, and performing site visits, as deemed necessary by the third party. This evaluation will include a review of SBC's quality review results. SBC began this process evaluation shortly after the MPSC approved this plan with a final report pursuant to BearingPoint's project plan.

CSI Accuracy Plan

- The third party will report the accuracy of customer service inquiry updates by comparing CSR updates with the local service requests for such activity using a nonbiased sample from the entire population of commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC and with the Illinois Commerce Commission ("ICC") staff prior to its implementation. BearingPoint began its analysis of commercial production transactions in early July , 2003 with a final report pursuant to BearingPoint's project plan. The accuracy of Customer Service Record updates is expected to improve when compared to BearingPoint's test results of 92% accurate. SBC's internal target is 95% accuracy. If the third party evaluation does not show the target has been achieved, any further required action will be determined by the ICC.
- SBC will file bimonthly third party reports until final process and transactions reports are completed. The first bi-monthly report, covering the April-May 2003 activity period, was filed on June 16, 2003. These reports will be filed with the IURC by the 15th of the following month and served on the parties of record for IURC Cause No. 41657.



IURC Cause No. 41657

Pre-Order Processing Timeliness Plan

July 11, 2003

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**INDIANA UTILITY REGULATORY COMMISSION
TELECOMMUNICATIONS DIVISION**

Pre-Order Processing Timeliness Plan

TABLE OF CONTENTS

1. **PURPOSE**..... 1

2. **ISSUE DEFINITION**..... 1

3. **ACTIONS** 2

4. **STATUS REPORTING**..... 5

Pre-Order Processing Timeliness Plan

1. Purpose

The purpose of this plan is to describe actions that the Indiana Bell Telephone Company ("SBC" or "SBC Indiana") has taken and plans to take to improve pre-order processing timeliness.¹

The Michigan Plan (upon which this Indiana plan is based) was developed pursuant to the Michigan Public Service Commission's ("MPSC's") Order issued January 13, 2003, in Case No. U-12320 (SBC's §271 Checklist Compliance Docket) as result of extensive discussion with MPSC staff and CLEC Industry Collaborative. On March 26, 2003 the MPSC approved this plan as submitted on March 13, 2003.

Because the pre-order processing improvement initiatives identified below are regional in nature, SBC is submitting this Indiana plan to reinforce that the benefits derived from this plan will apply to Indiana CLECs.

2. Issue Definition

BearingPoint, Inc. (f/k/a KPMG Consulting) performed a Pre-Order, Order and Provisioning Volume Test as part of the Third-Party Operations Support Systems ("OSS") testing. Following each of the multiple iterations of that testing, BearingPoint issued various Observations and Exceptions regarding the results. These Observations and Exceptions were consolidated into Exception 112.

During the course of volume testing, SBC made system enhancements addressing the functional issues and timing issues identified by BearingPoint. These enhancements were retested by BearingPoint in subsequent volume test iterations. BearingPoint's most recent analysis has confirmed that there are presently no unsatisfied determinations for the functionality evaluation criteria, and few issues with timeliness.

The timeliness of the EDI pre-order interface was the issue most consistently cited by BearingPoint during the course of its volume testing. Of the failed test points resulting from volume testing identified by BearingPoint in its report on the OSS Evaluation, virtually all are associated with pre-order transaction timeliness, and more with the timeliness of the EDI pre-order interface than with the CORBA or GUI interface².

¹ While the MPSC ordered the implementation of this plan to further improve its pre-order processing timeliness, the MPSC was clear, however, that the plan is not required to demonstrate that SBC is "... in compliance with each of the Section 271 competitive checklist items, including each of the areas addressed by the modified compliance and improvement plans." (MPSC Order, March 26, 2003, Case No. U-12320, page 2.)

² BearingPoint's Pre-Order, Order, and Provisioning volume test consisted of forty-four test points. Thirty-three of these test points were considered as satisfied in the May 12, 2003 OSS Evaluation report. The test

Pre-Order Processing Timeliness Plan

Based on then-current performance results, and taking into consideration the significant shift and trend by CLECs to use the CORBA and Verigate interfaces rather than the EDI interface for pre-order inquiries, SBC believes its EDI pre-order performance satisfactory. However, in response to the interest of parties to this OSS evaluation, SBC has continued to examine alternatives to improve EDI pre-order timeliness.

3. Actions

A. Pre-order EDI translator improvement results.

During 3Q02, SBC and Sterling Commerce worked to determine whether it was possible to improve the performance of its Gentran EDI translation software. After initially concluding that no such performance improvement was possible, a custom modification to the software configuration was attempted. This custom modification effectively reduced the amount of system processing performed on each transaction. Testing confirmed the performance improvement and that there was no detrimental impact on process functionality. This software configuration change was then made to the production EDI translator on September 11, 2002³.

Data collected by SBC for monitoring EDI translator performance shows a significant improvement as a result of this September 11 software configuration change. These data are included as Attachment 1.⁴ The average protocol translation time improved from 1.4 seconds inbound and 1.7 seconds outbound prior to the translator configuration change to .36 seconds inbound and .73 seconds outbound after the change; this can be seen in examining the data just before and just after implementation of the configuration change.

points not satisfied included timeliness of five individual EDI pre-order transaction types, timeliness of two individual GUI pre-order transaction types, timeliness of two individual CORBA pre-order transaction types, appropriateness of responses to GUI pre-order transactions, and timeliness of order reject transactions. See Indiana BearingPoint Report at pp. 823-914.

³ See AT&T's comments filed 11/15/02 with the MPSC, Connolly affidavit at pg. 34, ¶ 77, questioning whether SBC had actually placed the modified translator configuration into production.

⁴ MPSC January 13 Opinion and Order, pg. 5, requiring that SBC provide information to validate that the September 11, 2002 configuration change produced a decrease in translator processing time.

Pre-Order Processing Timeliness Plan

B. Pending Pre-order EDI translator improvement

Further, SBC will upgrade the existing SBC commercial EDI translator to the most recent version of software, Gentran:Server 6.0, in July, 2003. The configuration change, as outlined above, will be carried over to this upgraded version.

Sterling Commerce released a completely new version of their EDI translator software in late 2002. This new version is referred to as Sterling Integrator. SBC is evaluating this new translator software, and considering implementation of the software.

During October 2002, the SBC EDI group examined the technical documentation, viewed product demonstrations, and held discussions with the Sterling Integrator development team. While there are a number of new application management features in the Integrator product, no obvious performance enhancements over the translator software configuration presently in use by SBC were identified at that time.

Subsequently, SBC's translator operating environment was replicated for Sterling so that they could perform comparison measurements in their labs. On February 6, 2003, the Sterling technical team identified a potential way to further improve translator response time using Sterling Integrator. This solution, however, has limitations in its ability to handle multiple versions and trading partners. We are continuing investigation to determine if it is possible to realize the performance improvements while retaining necessary functionality.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status
1. Implement translator configuration change.	9/11/02	9/11/02	Completed
2. Upgrade EDI translator to latest available version (Gentran:Server 6.0)	02/03/03	7/15/03	In progress
A. Install Gentran:Server 6.0 on test server			Completed
B. Upgrade operating system version on production translator	02/03/03	Ongoing	In progress
C. Install Gentran:Server 6.0 on production translator	02/03/03	Ongoing	In progress
3. Evaluate performance of Sterling Integrator	12/15/02	Ongoing	In progress

C. Status of Performance Measure 2

As a means to monitor the future performance of the pre-order EDI translator, SBC had jointly proposed with CLECs, and the Indiana Utility Regulatory Commission ("IURC")

Pre-Order Processing Timeliness Plan

has approved, an immediate clarification and amendment to Performance Measure 2, Pre-Order Transaction Timeliness. In this clarification, the measurement of protocol conversion time is clearly defined. This modification to PM 2 is included with the January 30, 2003 filing to the Commission of performance measure modifications resulting from the collaborative six-month review, which was approved by the IURC on June 26, 2003. A copy of the modified PM2 is included as Attachment 2. The business rules now clearly define when and where the time stamps are to be taken for protocol translations and for the requested pre-order function. In addition a separate benchmark has been added for protocol translation for EDI, CORBA and WebVerigate. The modified PM2 was implemented in February 2003 results, reported in March 2003.

Protocol Translation Time – EDI (input and output)	95% in <= 4 seconds
Protocol Translation Time – CORBA (input and output)	95% in <= 1 seconds

Protocol Translation Time – WebVerigate (input and output)	95% in <= 1 second diagnostic
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4. Status Reporting

SBC will file a report regarding its progress on pending pre-order EDI translator improvement discussed in Section 3(b) above to the Commission for its review and serve the report upon the parties of record in IURC Cause No. 41657 in July 2003 and quarterly thereafter, if needed. SBC will report protocol translation times in accordance with the terms of PM 2 effective with February 2003 results, reported in March 2003.

Pre-Order Processing Timeliness Plan

EDI Protocol Translation Time (Pre-Order)

SENDER	LOG_DATE	IN_AVG	OUT_AVG	TRANS_COUNT	IN_SEC_TOT	OUT_SEC_TOT
EDI	20020901	0.976	1.748	1	0.976	1.748
EDI	20020903	1.451	1.617	1207	1751.52	1951.839
EDI	20020904	1.514	1.665	1164	1761.853	1937.84
EDI	20020905	1.474	1.658	775	1142.69	1285.139
EDI	20020906	1.469	1.603	751	1103.225	1203.565
EDI	20020907	1.346	1.445	20	26.927	28.907
EDI	20020909	1.472	1.646	1051	1546.858	1729.577
EDI	20020910	1.497	1.62	900	1346.923	1458.101
EDI	20020911	1.474	1.672	759	1119.057	1269.149
Totals				6628	9800.029	10865.865
				Avg IN =	1.478580115	
				Avg OUT=		1.639388202
EDI	20020912	0.344	0.569	814	279.847	463.402
EDI	20020913	0.342	0.549	982	335.503	539.067
EDI	20020914	0.347	0.671	47	16.3	31.537
EDI	20020915	0.353	0.759	36	12.691	27.34
EDI	20020916	0.361	0.693	2081	751.99	1442.01
EDI	20020917	0.383	0.706	1910	731.324	1347.946
EDI	20020918	0.347	0.749	2030	704.384	1520.846
EDI	20020919	0.349	0.717	1849	645.167	1325.398
EDI	20020920	0.345	0.738	1780	613.31	1312.95
EDI	20020921	0.349	0.61	68	23.726	41.507
EDI	20020922	0.372	0.613	35	13.02	21.441
EDI	20020923	0.343	0.692	2350	806.808	1626.588
EDI	20020924	0.359	0.782	3000	1078.345	2345.589
EDI	20020925	0.347	0.749	2053	712.898	1538.3
EDI	20020926	0.383	0.796	1956	748.237	1556.162
EDI	20020927	0.385	0.773	1829	703.929	1413.058
EDI	20020928	0.391	0.72	92	35.983	66.195
EDI	20020929	0.544	0.844	24	13.047	20.252
EDI	20020930	0.385	0.779	2965	1140.448	2309.75
Totals				25901	9366.957	18949.338
				Avg IN =	0.361644608	
				Avg OUT=		0.731606424

This table shows the time required for processing transactions through SBC Midwest's pre-order EDI translator. All LSOG 5 EDI pre-order transactions for the region are included.

Information is compiled from raw data captured from the EDI translator and has not been modified to be consistent with the expected reporting of this information

Dates are in the format of YYYYMMDD, times are in seconds.

Pre-Order Processing Timeliness Plan

The following table provides data resulting from an analysis of EDI protocol timeliness for three recent months (December 2002 – February 2003) per the business rules for PM 2 as approved by the IURC on June 26, 2003. Note that EDI timeliness exceeded the benchmark established in the recently-updated PM 2 for all three months.

Month	Count	EDI-IN	EDI-OUT
December 2002	127925	99.48%	95.75%
January 2003	129536	99.37%	98.33%
February 2003	189805	99.45%	96.49%

Pre-Order Processing Timeliness Plan

2. Percent Responses Received within "X" seconds – OSS Interfaces
Definition:
The percent of responses completed in "x" seconds for pre-order interfaces (WebVerigate, EDI and CORBA) by function.
Exclusions:
<ul style="list-style-type: none">• None
Business Rules:
<p>Timestamps for the interfaces (WebVerigate, EDI and CORBA) are taken at the SBC Pre-Order Adapter and do not include transmission time through the xRAF or protocol translation times. The clock starts on the date/time when the query is received by the SBC Pre-Order Adapter and stops at the date/time the SBC Pre-Order Adapter passes the response back to the interfacing application (WebVerigate, EDI pre-order or CORBA). The response time is measured only within the published hours of interface availability as posted on the CLEC On-line website.</p> <p>https://clec.sbc.com/clec/hb/filelist/docs/011030-012759/OSS Hours of Operation.xls</p> <p>For the protocol translation response times, interface input times start at the time the interface receives the pre-order query request from the CLEC and the end time is when the connection is made to the SBC Pre-Order Adapter for processing. Interface output times start when the interface receives the response message back from SBC Pre-Order Adapter and the end time is when the message is sent to the CLEC.</p> <p>If the CLEC accesses SBC systems using a Service Bureau Provider, the measurement of SBC's performance does not include Service Bureau Provider processing, availability or response time.</p>

Pre-Order Processing Timeliness Plan

Levels of Disaggregation:

- Address Verification
- Telephone Number Assignment (includes inquiry, reservation, confirmation and cancellation transactions)
- Customer Service Inquiry (CSI) ≤ 30 WTNs (Also broken down for Lines as required for DIDs).
- Customer Service Inquiry (CSI) > 30 WTNs/lines
- Service Availability
- Service Appointment Scheduling (Due Date)
- Dispatch Required
- PIC
- Actual Loop Makeup Information requested
- Design Loop Makeup Information requested (includes Pre-Qual transactions)
- Protocol translation time – EDI (includes input and output times)
- Protocol translation time – CORBA (includes input and output times)
- Protocol translation time – WebVerigate (includes input and output times)

Calculation:

(# of responses within each time interval \div total responses) * 100

Report Structure:

Reported for a CLEC, all CLECs, and SBC affiliate where applicable (or SBC acting on behalf of its' affiliate), by interface.

Measurement Type:

	IL	IN	MI	OH	WI
Tier 1	Low	Low	Med	Low	Low
Tier 2	Med	Med	Med	Med	Med

Benchmark:

No damages will apply to the Protocol Translation Times for WebVerigate. No damages apply to the disaggregation for CSIs with greater than 30 WTNs/lines. Critical z-value does not apply.

Measurement		WebVerigate, EDI and CORBA
Address Verification		95% in ≤ 10 seconds
Telephone Number Assignment (includes inquiry, reservation, confirmation and cancellation transactions)		95% in ≤ 10 seconds
Customer Service Inquiry ≤ 30 WTNs/lines		95% in ≤ 15 seconds
Customer Service Inquiry > 30 WTNs/lines		95% in ≤ 60 seconds diagnostic

Pre-Order Processing Timeliness Plan

Service Availability		95% in <= 13 seconds
Service Appointment Scheduling (Due Date)		95% in <= 5 seconds
Dispatch Required		95% in <= 19 seconds
PIC		95% in <= 25 seconds
Actual Loop Makeup Information requested (5 or less loops searched)		95% in <= 30 seconds
Actual Loop Makeup Information requested (greater than 5 loops searched)		95% in <= 60 seconds
Design Loop Makeup Information requested (includes Pre-Qual transactions)		95% in <= 15 seconds
Protocol Translation Time – EDI (input and output)		95% in <= 4 seconds
Protocol Translation Time – CORBA (input and output)		95% in <= 1 seconds
Protocol Translation Time – WebVerigate (input and output)		95% in <= 1 second diagnostic



IURC Cause No. 41657

Line Loss Notifier Communications Plan

July 11, 2003

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JUL 11 2003

**INDIANA UTILITY REGULATORY COMMISSION
TELECOMMUNICATIONS DIVISION**

Draft Line Loss Notifier Communications Plan

TABLE OF CONTENTS

1.	PURPOSE.....	1
2.	ISSUE	1
3.	ACTIONS	2
4.	STATUS REPORTING	4

Line Loss Notifier Communications Plan

1. Purpose

The purpose of this plan is to describe action the Indiana Bell Telephone Company ("SBC" or "SBC Indiana") has taken and will take to improve communications regarding line loss notifiers ("LLNs").¹ Specifically, this plan details the communications process that will be used when SBC determines that an interruption of LLNs could affect more than one CLEC. It also describes the monthly report that SBC will provide to the Indiana Utility Regulatory Commission ("IURC") for at least six months.²

The Michigan Plan (upon which this Indiana plan is based) was developed pursuant to the Michigan Public Service Commission's ("MPSC's") Order issued January 13, 2003, in Case No. U-12320 (SBC's §271 Checklist Compliance Docket) as result of extensive discussion with MPSC staff and CLEC Industry Collaborative. On March 26, 2003 the MPSC approved this plan as submitted with minor modifications on March 13, 2003. Final modifications were made to this plan in compliance with the MPSC's Order issued March 26, 2003 and resubmitted to the MPSC on April 2, 2003.

Because the initiatives identified below to improve communications regarding LLNs are regional in nature, SBC is submitting this Indiana plan to reinforce that the benefits derived from this plan will apply to Indiana CLECs.

2. Issue

BearingPoint, Inc. (f/k/a KPMG Consulting) performed testing of line loss notification as part of the Third-Party Operations Support Systems ("OSS") testing. Two types of tests were performed: one using Test CLEC transactions that tested the entire line loss process and transaction flow (Line Loss Timeliness), and a second test using a large sample of production orders to further confirm the logic used by SBC to generate line loss notifications (Line Loss Accuracy). The timeliness test initially resulted in the issuance of an Exception (138); however a subsequent retest by BearingPoint concluded satisfactorily. The accuracy test was satisfied in a single attempt.

In its November 12, 2002 Disposition Report for Exception 138 regarding Test CLEC line loss testing in Indiana, BearingPoint reported that, based on their testing associated with that Exception and the resulting 96.7% success rate, "the issues identified in this Exception Report have been addressed." This finding, coupled with BearingPoint's test results associated with test criterion TVV4-28 for Line Loss Accuracy testing, confirm that the process improvements implemented by SBC during the period

¹ While the MPSC ordered the implementation of this plan to further improve communication regarding line loss notifiers, the MPSC was clear, however, that the plan is not required to demonstrate that SBC is "... in compliance with each of the Section 271 competitive checklist items, including each of the areas addressed by the modified compliance and improvement plans." (MPSC Order, March 26, 2003, Case No. U-12320, page 2.)

² This plan does not address any additional changes to Performance Measure MI 13. Modification to PM MI 13, and the creation of an additional measure MI 13.1, were filed in Indiana on June 12, 2003 and became effective on June 26, 2003.

Line Loss Notifier Communications Plan

of the OSS Evaluation had the intended result, i.e., a reliable process for delivery of line loss notifications to CLECs. BearingPoint's line loss test results are contained in its February 28, 2003 Indiana OSS Evaluation Project Report as TVV4-28 (accuracy) and TVV4-29 (timeliness) at pp. 947-948.

As a result of discussion with its CLEC customers, however, SBC determined that improvements in communication of status of the line loss notifier process could still be made. Consequently, in its October 30 Filing with the MPSC, SBC proposed a plan to improve that communication; the plan was based on discussions during the technical workshops held in Michigan on October 14 - 18, 2003. Based on subsequent CLEC comments regarding that plan, the MPSC's direction in its January 13 Order, and the aforementioned Collaborative activity in March 2003, SBC enhanced the Michigan plan, and brings the enhancements forward to this Indiana plan as well.

3. Actions

A. Definition of Line Loss Notification Interruption

A "line loss notification interruption" would require the issuance of an accessible letter to all CLECs in the Midwest region, if it affected more than one CLEC. The "line loss notification interruption", which includes any winback situations, would be included in the monthly report filed with the IURC if it affected any CLEC. (See, paragraphs 3(B) and 3(C) below, respectively.) A "line loss notification interruption" includes any of the following:

- (i) Missing LLNs, which includes any delay in transmission of mechanized LLNs by SBC for more than four (4) business days from completion of work. The determination of whether a LLN was sent shall be calculated as provided in the Performance Measure Business Rules, including all exclusions, for PM MI 13.1, "Average Delay Days for Mechanized Line Loss Notifications."
- (ii) Inaccurate line loss notifications, which includes LLNs that were transmitted but contained either inaccurate or missing required data, such as conversion dates or affected telephone numbers.
- (iii) Improperly formatted LLNs, which include LLNs transmitted in a format other than expected (e.g., missing fields).
- (iv) Systemic transmission of LLNs in a mode, either an EDI 836 transaction, LEX GUI, or fax, that does not match the LLN mode contained in the CLEC's profile for LLNs. This excludes LLNs manually generated proactively by SBC.

Note: Any issues arising from a mix up in LSOR versions will be accounted for within this process, but dependent upon the particular situation, may vary as to which of the above categories this issue fits into.

B. LLN Accessible Letters

In its October 30 Filing to the MPSC, SBC proposed a plan for line loss notifiers that proposed improvements in communications from SBC to CLECs should future incidents occur related to the

Line Loss Notifier Communications Plan

delivery of line loss notifiers. The improvement in communication was based on the issuance of Accessible Letters ("ALs") to provide pertinent information to CLECs in a timely manner.

SBC implemented enhanced communication procedures in November 2002 that included an initial notification upon identification and then a follow-up notification upon resolution for line loss issues that affect more than one CLEC. Accessible Letter CLECAM02-122 issued November 12, 2002, is an example of an initial notification to CLECs of a line loss notifier interruption. CLECAM02-123 issued November 13, 2002 was then issued to provide follow-up information regarding the same incident. This follow-up AL provided further information regarding the interruption as soon as it was available to SBC.

In response to the January 13, 2003 MPSC Order and the comments of CLECs regarding the initial version of the plan, SBC will provide the following information to CLECs regarding line loss notice interruptions that could affect more than one CLEC:

- Within one business day³ of SBC determining that a line loss notification interruption has occurred, as defined above in paragraph 3(A), that could affect more than one CLEC, SBC will issue an Accessible Letter ("AL") to all CLECs in the Midwest region. The AL will include any details available at the time of issuance that SBC has confirmed to be accurate and complete, concerning the cause, scope and duration of the LLN issue.
- Within 1 business day of SBC identifying the affected CLECs, SBC (Account Teams and/or OSS Managers) will contact those affected CLECs directly using the currently-designated customer contact maintained by the SBC OSS Support organization. Each situation varies in complexity and so the timeframe, as to when the affected CLECs will be identified, cannot be further defined.
- Because SBC will act as soon as there is a reasonable indication of a line loss issuance incident, the initial AL may not contain complete information. As soon as such information can be determined and confirmed, SBC will issue follow-up AL(s) and contact affected CLECs as needed with CLEC-specific information. Upon resolution of the issue, a final follow-up AL will be provided to all CLECs in the Midwest region.
- If SBC changes its line loss notifier procedures, including those contained in this plan, it shall immediately provide appropriate notification. Notification will be provided for any change to the procedures for delivering the actual line loss notification that would affect the format, data content, delivery method (other than normal changes via established processes, such as a new CLEC profile), or criteria for issuance of line loss notification transactions. Such notification will be provided in the manner defined by Change Management Process ("CMP") guidelines, including the communications improvements noted in a separate plan filed simultaneously with this one. Where notification is appropriate but not covered by CMP, an AL will be issued.
- SBC commits to continuation of its cross-functional team that supports the "safety net" process for the review and evaluation of timely and accurate LLN issuance. SBC will evaluate the need for continuation at the end of the IURC's required reporting period and provide the IURC with a 30-day notice of any discontinuance.

³ The MPSC Order noted that these accessible letters should be sent "within 24 hours of determining that an interruption of line loss notification issuance has occurred .." This plan states that such letter be sent within one business day to conform to SBC's operational schedule and to be consistent with PM MI 13.

Line Loss Notifier Communications Plan

C. Monthly Reporting to the IURC

SBC will provide monthly reports to the IURC regarding line loss issues for a minimum period of six months. The reports will be due by the 10th day of the following month.

The report will include information regarding line loss issues that have been identified by SBC during the reported calendar month; their cause, duration, scope of loss notifiers affected, number of LLNs affected by month (including both region-wide and state specific numbers where available), number of providers affected, and actions taken to address the issues.⁴ Providing a comparison to the total number of LLNs sent for the reporting month is not possible within the current stated reporting timeframe. The total numbers of all LLNs sent during the reporting month would not yet be available on the 10th of the next month. As a result, SBC will provide the total number of LLNs sent during each of the three months prior to the month of reporting, at both a regional and state level. These monthly LLN totals will be provided with every monthly report. This will allow the IURC to compare the number of LLNs reported for that month, as a percentage of the total number of LLNs sent out by SBC on a monthly basis. Additionally, any referenced accessible letters will be provided with the report.

Further, if an identified issue has not reached resolution during the calendar month identified, it will be repeated in subsequent month(s) until resolved so that all required information is known and can be reported.

SBC will use the definition of line loss notification interruption provided in section 3(A) above when determining what should be included in the report.

In Michigan, the monthly report for February 2003 was filed on March 10, 2003; note the inclusion of information regarding cause, duration, scope of loss notifiers affected, number of CLECs affected, and actions taken to address the issues. The report for March 2003, as well as the updated reports for January 2003 and February 2003, filed on April 10, 2003, provide the additional data, including monthly totals, as identified above. These Michigan reports are available for review by the IURC.

4. Status Reporting

SBC will file its monthly line loss issues report with the IURC on the 10th of the following month beginning July 10, 2003, with service on the parties of record for IURC Cause No. 41657. At that time SBC will file reports for April, May and June 2003. SBC will provide reports covering a minimum of a six month period.

⁴ Per the January 13, 2003 MPSC Order, page 6.



IURC Cause No. 41657

**Directory Listings &
Directory Assistance Database
Update Accuracy Plan**

July 11, 2003

RECEIVED

JUL 11 2003

INDIANA UTILITY REGULATORY COMMISSION
TELECOMMUNICATIONS DIVISION

DL/DA Update Accuracy Compliance Plan

TABLE OF CONTENTS

1.	PURPOSE	1
2.	ISSUE DEFINITION	1
3.	ROOT CAUSE ANALYSIS	2
4.	ACTIONS	2
5.	THIRD PARTY EXAMINATION APPROACH.....	7

1. Purpose

The purpose of this Plan is to describe the actions the Indiana Bell Telephone Company (“SBC” or “SBC Indiana”) proposes to take to further improve certain aspects of directory listings and directory assistance database (“DL/DA”) update accuracy.

This plan was developed to address a Not Satisfied test point in the SBC Michigan third party Operations Support Systems (“OSS”) Test Report issued by BearingPoint on October 30, 2002.¹ This same test point was rated as Satisfied in the Indiana BearingPoint Report issued on February 28, 2003. Nevertheless, SBC is submitting this plan in Indiana as the improvements brought about by this plan will also have a positive impact on Indiana's DL/DA accuracy since these tasks and systems are regional in nature and are not state specific.

The Michigan Plan (upon which this Indiana plan is based) was developed pursuant to the Michigan Public Service Commission’s (“MPSC’s”) Order issued January 13, 2003, in Case No. U-12320 (SBC’s §271 Checklist Compliance Docket) as result of extensive discussion with MPSC staff and CLEC Industry Collaborative. SBC has retained BearingPoint to evaluate SBC’s implementation of this plan. On March 26, 2003 the MPSC approved this plan as submitted on March 13, 2003.

2. Issue Definition

BearingPoint, Inc. (f/k/a KPMG Consulting) first raised this issue in Indiana in Exception 106 as part of the Third Party Operations Support Systems (“OSS”) testing on May 9, 2002 stating that they have observed instances of incorrect updates to SBC’s directory assistance database. In this test, information contained within the directory listings and directory assistance database were evaluated for accuracy against field inputs from submitted Test CLEC orders, i.e., Local Service Requests (“LSRs”). In the course of evaluating this issue, BearingPoint tested DL/DA accuracy twice over an eight-month period. In December 2002, BearingPoint’s re-testing was successful and a final disposition report was issued on December 10, 2002. BearingPoint’s February 28, 2003 Indiana OSS Evaluation Project Report at p. 931 found that test criteria for TVV4-1 was “satisfied.”

In response to BearingPoint’s evaluation, SBC implemented system modifications and process improvements that improved tested performance in Indiana from 37.2% to 96.9%. SBC believes that the remaining errors identified in the OSS test are either

¹ While the MPSC ordered the implementation of this plan to further improve its Directory Assistance and Directory Listings Update Accuracy. The MPSC was clear, however, that the plans were not required to demonstrate that SBC was “... in compliance with each of the Section 271 competitive checklist items, including each of the areas addressed by the modified compliance and improvement plans.” (MPSC Order, March 26, 2003, Case No. U-12320, page 2.)

DL/DA Update Accuracy Compliance Plan

immaterial in nature or are associated with product ordering scenarios not widely seen in the commercial environment.

3. Root Cause Analysis

The process for updating the directory assistance database begins when a CLEC submits a local service request (“LSR”) or a stand-alone directory service request (“DSR”) that requests an update to directory listing (“DL”) names, addresses or telephone numbers. (A Local Number Portability – Only (“LNP-only”) request requires the CLEC to submit a separate DL service request.). During the process, a directory listing is modified based on the information provided by the CLEC in the LSR or DSR.

In Michigan, BearingPoint conducted three separate DL/DA accuracy tests over a six-month period. In keeping with the “military style” nature of the OSS test, these tests were executed in a serial fashion, with each succeeding test validating the changes made by SBC to correct the failures of previous tests. Therefore, all failure points from the first two Michigan DL update accuracy tests that were not identified by BearingPoint in its report of the third and final test can be considered properly corrected by SBC Michigan and validated by BearingPoint. Accordingly, SBC’s root cause analysis focuses on the remaining failure points of the third Michigan test.

The results of the third DL update accuracy test in Michigan, as reported by BearingPoint, show orders failing to accurately update the Directory Assistance Database. In its analysis of these results, SBC Michigan determined that the primary cause of DL/DA update inaccuracies was intermittent errors on manually handled orders and generally associated with complex listings². In other words, the majority of the identified errors were caused by service representatives handling complex listings.

As a result of the Michigan findings, improvement steps were implemented prior to similar retesting in the other SBC Midwest States. These improvements, which included system and procedural enhancements, plus Local Service Center (“LSC”) Service Representative training, resulted in Exception 106³ passing the BearingPoint retest in Indiana, as noted above, with a success rate of 96.9% .

4. Actions

The compliance plan for DL/DA update accuracy proposed by SBC Michigan in its October 30, 2002 Compliance Filing with the MPSC was constructed to address the reliability and accuracy of manual service orders. The plan included systems modifications, manual process updates, and the development and delivery of a quality

² An example of a Complex listing is a caption listing that has one or more indented listings grouped (or captioned) beneath the main listed name. This is mainly used for hospitals, schools and government agencies.

³ See BearingPoint’s Exception 106 Disposition Report, published on December 10, 2002 on the [OSS Testing](#) web site.

DL/DA Update Accuracy Compliance Plan

awareness training package to the hundreds of SBC service representatives that handle CLEC service orders. Additionally, it called for the implementation of a service order quality review process consisting of reviews of daily production service orders, corrections of identified errors, and coaching and/or process/system improvements based on data gathered from the review process.

The MPSC in its January 13, 2003 Order indicated that the DL/DA update accuracy compliance plan should be expanded, to the extent possible, to address the specific comments of AT&T. In reference to the DL/DA update accuracy compliance plan, AT&T made reference to: how the system enhancements address the issues at hand; when and where the issues at hand originated; the purpose of the manual work-around and how it is different from current practices; the limited nature of the long-term mechanism as it applies to one error type; as well as, the same issues raised with the Customer Service Inquiry ("CSI") Accuracy Plan (the content of the service representative training package, the period of the training, the scope of the quality improvement effort, a commitment by SBC to fix errors identified as part of its quality review, the scope of testing⁴, and the potential need for a performance measure⁵). SBC Michigan has addressed the requirements of the MPSC and responded to the comments of AT&T in the following enhanced plan.

SBC is taking the following steps to improve the accuracy of DL/DA:

1. System and Process Enhancements

- SBC installed vendor software updates to allow automated daily transfers of Mechanized Order Receipt ("MOR") files to the Advance Listing Products and Services System ("ALPSS") in December 2002.
 - This automated task replaces a manual process that was performed periodically throughout the day and occasionally executed prior to the MOR data being available, thus delaying the update.
 - This enhancement ensures an improvement in timely receipt of mechanized orders, as manual intervention will be minimized/eliminated.
- SBC implemented an interim manual work process in December 2002, to resolve ALPSS errors identified in the "Skipped Section Report"⁶ within three business days.
 - This new daily work process ensured the minimization of "Skipped Section Report" backlogs and, in turn, improved the timely handling of errors

⁴ However, as noted below, BearingPoint will conduct an evaluation based on sampling of actual commercial production orders that include a diverse set of product and listings types.

⁵ See AT&T's comments filed 11/15/02 with the MPSC, Connolly affidavit at pg. 23, ¶¶ 57-61. SBC does not believe that a separate performance measure is necessary. Performance measure changes are discussed in the performance measure six-month review; one of which has just concluded.

⁶ The "Skipped Section Report" is produced daily and contains service orders, which could not be added to the APLSS system due to unanticipated error conditions (e.g. duplicate telephone number, corrupted data, etc). This report is used to investigate the root cause and the necessary corrective action to resolve these errors.

DL/DA Update Accuracy Compliance Plan

identified by ALPSS. As result, SBC believes the DL/DA update accuracy has improved through better error handling.

- SBC implemented a long term mechanical process to route orders identified by the “Skipped Section Report” into the established ALPSS error handling process prior to March 1, 2003.
 - While not replacing the “Skipped Section Report” manual work process, this enhancement further automated the ALPSS error handling and minimized manual processes by better identifying errors that would otherwise be handled manually.

2. Service Representative Training

SBC developed for LSC service representatives a Service Order Quality informational package⁷ directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during training to service representatives involved in producing SBC Customer Information System (“ACIS”) service orders. This package provides information such as the importance of accurate orders, and the impacts of inaccurate orders on CLECs and end-users. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, 2002, and applies across the entire SBC Midwest region.

- Starting in January 2003⁸, service representatives will receive training using the Service Order Quality informational package.
 - The training was completed by May 31, 2003.
 - The intended audience for training was service representatives that produce and process Resale and UNE-P service orders for the ACIS system.
 - Review of the package was accomplished in mandatory training sessions facilitated by SBC’s Training Department. Logs were maintained to track attendance and manage attendance compliance.
 - A General Manager, Area Manager or Line Manager addressed each class with a list of Talk Points to emphasize management’s commitment to service order accuracy.

3. DL/DA Quality Review

- SBC is designing an internal quality review process for DL/DA accuracy. This review will rely on sampling UNE-P and Resale production service orders that drop to manual handling (“manual-manual” and “auto-manual”) to monitor DL/DA

⁷ See AT&T’s comments filed 11/15/02 with the MPSC, Connolly affidavit at pg. 19, ¶ 43. SBC has expanded the detail provided in this compliance plan to address the description of the information contained in the training package as well as its goal, and inclusion of a review of that information package by the third party contractor.

⁸ See AT&T’s comments filed 11/15/02 with the MPSC, Connolly affidavit at pg. 20, ¶ 44. SBC has expanded the detail provided in this compliance plan to address specific timeframes for each action item, including component items of each action item.

DL/DA Update Accuracy Compliance Plan

accuracy. The intent of the sampling activity is to assist in identifying potential problem areas in the manual processing of these orders. While SBC initially intends to conduct this sampling activity in a statistically valid manner by randomly selecting 150 orders each month from the total population under review, it may determine the need to modify this activity to meet its ultimate goal: Monitoring the effectiveness of its training and helping identify potential corrective actions. In fact, as a result of discussions during the March 4 - 5, 2003 MPSC collaborative session, SBC agreed to augment its sample of 150 orders to include at least 10 complex orders each month. These quality reviews will be conducted on an ongoing basis. Initially, the reviews are intended to be conducted daily.

- Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision ("LSC") Support System ("DSS"). DSS is a reporting system used by the LSC to track and capture information on order activity. The DSS system is separate from the systems that process the actual production order.
- The criteria for sampling will include product type and process type. Sampled orders will come from both manual-manual and auto-manual orders.
- Quality Assurance ("QA") service representatives, experienced service representatives selected for this purpose, will conduct reviews using methods and procedures developed specifically for this process.
- Potential order discrepancies will be reviewed to:
 - Verify that discrepancies are in fact errors;
 - Correct identified errors on pending orders;
 - Identify root causes of errors;
 - Provide the basis for individual coaching of service representatives.
- The QA service representatives will compare the CLEC Local Service Request to the corresponding internal service order on a field by field basis. Corrections will be made as necessary.

4. Corrective Actions

- SBC plans to address discrepancies identified during its quality reviews as described above in the following manner:
 - Review results will be documented in a new LSC database to track performance, identify trends, and provide reports for LSC management.
 - Information on the errors and root cause(s) identified will be analyzed using tracked data to ascertain if common issues or trends are apparent.
 - This information will be used to determine whether individual service representative coaching is needed, or if additional training, and/or changes to processes, and/or methods and procedures, and/or systems are needed. SBC will implement appropriate corrective actions as warranted, including changes to processes, systems and/or additional training.

The following table provides the schedule for the actions discussed in this section:

DL/DA Update Accuracy Compliance Plan

Task	Begin	End	Status
System-Related Tasks			
1. Implement system changes to allow automated daily file transfers of MOR files to AAS/IT	10/28/02	12/31/02	Completed
A. Develop and test AAS/IT Interface software modification	10/28/02	11/01/02	Completed
B. Develop MOR Interface modification	10/28/02	11/01/02	Completed
C. Install MOR Interface modification	11/10/02	12/31/02	Completed
2. Implement interim manual work process for ALPSS errors identified in the "Skipped Section Report" within three business days	10/01/02	Ongoing	In progress
A. Review existing process to determine backlog avoidance	10/01/02	11/01/02	Completed
B. Implement interim manual work process	11/01/02	12/01/02	Completed
C. Managers report weekly backlog information (numbers, age, etc.)	12/01/02	Ongoing	In progress
D. Manager evaluates "Skipped Section Report" and takes action to ensure a backlog does not occur	12/01/02	Ongoing	In progress
3. Implement system changes to ALPSS error handling process to route listings identified by the "Skipped Section Report"	11/13/02	03/03/03	Completed
A. Receive ALPSS new software version from vendor	11/13/02	11/13/02	Completed
B. Perform testing	11/14/02	02/02/03	Completed
C. Installed in production	03/01/03	03/03/03	Completed
Quality Assurance-Related Tasks			
1. Develop Service Order Quality informational package and provide training to all LSC UNE-P and Resale Service Representatives.	11/15/02	5/31/03	Complete
A. Determine and assign resource to lead "informational package" development effort	11/15/02	12/31/02	Complete
B. Produce "informational package"	12/01/02	12/31/02	Complete
C. Determine training deployment method	12/01/02	01/06/03	Complete
D. Create training schedule or plan	12/01/02	01/14/03	Complete
E. Conduct training	01/15/03	05/31/03	Complete
2. Design and implement a quality review process for validating the accuracy of the ACIS DL/DA record updates, which includes both sampling and quality reviews of Unbundled Network Elements – Platform ("UNE-P") and Resale orders.	12/15/02	Ongoing	In progress
A. Design quality review process	12/15/02	1/31/03	Complete
B. Implement daily quality review of Resale and UNE-P orders	02/03/03	Ongoing	In progress

DL/DA Update Accuracy Compliance Plan

Task	Begin	End	Status
3. Identify root causes of errors identified by quality review and sampling processes	12/15/02	Ongoing	In progress
A. Develop identification and tracking process	12/15/02	2/5/03	Completed
B. Identify training or other 'correcting' opportunities	02/03/03	Ongoing	In progress
C. Implement corrective actions	02/03/03	Ongoing	In progress

5. Third Party Examination Approach

Upon completion of the above described training program and an appropriate period of the new internal quality review as set by SBC, this compliance plan will be evaluated by a third party. While the third party selected will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include a process evaluation and a review of actual commercial transactions as follows:

- The third party will evaluate SBC's implementations of the actions described in this compliance plan by reviewing documents, conducting interviews, and performing site visits. This evaluation will include a review of SBC's quality review results. SBC began this process evaluation shortly after the MPSC approved this plan with a final report pursuant to BearingPoint's project plan.
- The third party will review accuracy of DL/DA updates by comparing updates with local service requests using an unbiased sample from the entire population of commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC and with the Illinois Commerce Commission (ICC) prior to its implementation. BearingPoint began its analysis of commercial production transactions in early July, 2003 with a final report pursuant to BearingPoint's project plan. SBC's target is 95% accuracy. If the third party evaluation does not show the target has been achieved, any further required action will be determined by the MPSC.

SBC will file bimonthly third party reports until final process and transactions reports are completed. The first bimonthly report, covering the April-May 2003 activity period, was filed on June 16, 2003. These reports will be filed with the Indiana Utility Regulatory Commission ("IURC") and served on the parties of record for IURC Cause No. 41657.



IURC Cause No. 41657

Bill Auditability and Dispute Resolution Plan

July 11, 2003

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JUL 11 2003

**INDIANA UTILITY REGULATORY COMMISSION
TELECOMMUNICATIONS DIVISION**

Bill Auditability and Dispute Resolution Plan

TABLE OF CONTENTS

1.	PURPOSE	1
2.	ISSUE DEFINITION	2
3.	ACTIONS	3
4.	STATUS REPORTING	7

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Bill Auditability and Dispute Resolution Plan

1. Purpose

The purpose of this plan is to describe the actions the Indiana Bell Telephone Company ("SBC" or "SBC Indiana") proposes to take to address Billing Auditability and Billing Dispute resolution process concerns that have been raised.¹

The Michigan Plan (upon which this Indiana Plan is based) was developed pursuant to the Michigan Public Service Commission's ("MPSC's") Order issued January 13, 2003 ("January 13 Order"), in Case No. U-12320 (SBC's §271 Checklist Compliance Docket) as a result of extensive discussion with MPSC staff and CLEC Industry Collaborative. On March 26, 2003 the MPSC approved this plan as submitted with minor modifications on March 13, 2003. Final modifications were made to this plan in compliance with the MPSC's Order issued March 26, 2003 and resubmitted to the MPSC on April 2, 2003.

For the most part, the billing auditability and the billing dispute resolution process comments made or filed by the CLECs during November 2002 were general in nature with few actionable specifics provided.² Based on these comments and information gathered from its account managers and other staff involved in providing support to CLECs, SBC understood the billing auditability issue to be difficulties in reconciling CABS billing statements and with utilizing SBC's billing dispute resolution process when issues arise.

This plan addresses the general bill auditability and dispute resolution process concerns that have been raised. Status on these actions will be monitored by SBC and filed with the MPSC with service on the parties of record for MPSC Case No. U-12320 and shared with the Indiana Utility Regulatory Commission ("IURC"), with service on the parties of record for IURC Cause No. 41657.

This plan does not address CLEC-specific billing questions. SBC believes that those issues are best addressed on an individual basis with the questioning CLEC and will continue to do so consistent with existing processes and procedures.³

¹ While the MPSC ordered the implementation of this plan to address CLEC comments made or filed during November 2002 in relation to billing auditability and the billing dispute resolution process, the MPSC was clear that the plans were not required to demonstrate that SBC was "... in compliance with each of the Section 271 competitive checklist items, including each of the areas addressed by the modified compliance and improvement plans." (MPSC Order, March 26, 2003, Case No. U-12320, page 2.)

² See Transcript of November 25, 2002 MPSC Public Hearing on 271 Matters specifically comments of: TDS Metrocom (T5953) and ZTel T5961, T5967). Also, see XO Michigan, Inc's November 5, 2002 Comments on Three Months of Ameritech Performance at p. 5.

³ On January 27, 2003, James Denniston of WorldCom submitted specific questions regarding particular USOC and rate element applications for UNE-P via e-mail to counsel for SBC. On February 25, 2003, SBC's Account Team responded.

Bill Auditability and Dispute Resolution Plan

2. Issue Definition

A. CABS Billing Auditability

The billing auditability concerns appear to be focused on the Carrier Access Billing System ("CABS"). SBC Midwest implemented CABS BOS BDT⁴ format billing for all UNE products in October 2001, consistent with the FCC's Uniform and Enhanced OSS Plan of Record (the "POR"). The CLECs in general, and WorldCom in particular, were strong proponents of the move to CABS billing. As WorldCom stated, CABS billing "results in a highly dependable and auditable bill."⁵

CABS is an industry standard format for billing that has been in use for years in the interexchange access business as well as by CLECs. These industry standards are defined by the Ordering and Billing Forum ("OBF"), which includes CLEC representation. As an OBF member, SBC adheres to the CABS billing requirements set by the OBF. This adherence ensures that all SBC Midwest CLEC customers receive a standard, non-discriminatory bill format, which is documented, and subject to an externally controlled change process. Accessible letters are issued to notify the CLECs of software changes to CABS; these notices include illustrative exhibits when appropriate.

SBC understands that not all CLECs may be conversant in reviewing their billing statements for auditing purposes. SBC CLEC Billing Workshops are available in each of the SBC regions to help CLECs read and interpret the CABS, LEC Services Billing ("LSB"), and Resale Billing System ("RBS") bills received from SBC. This 1-1/2 day workshop includes information on identifying the components that make up the CABS, LSB and RBS bills as well as using Daily Usage Files ("DUF") and Ameritech Electronic Billing System ("AEBS") files. The workshop is available on an ongoing basis for scheduling; additional sessions can be added as needed based upon CLEC demand. Requests for any "on demand" courses are typically added to the schedule within a few weeks. In 2002, this Billing workshop was conducted seven times with 20 CLECS participating in one or more sessions.⁶ Three workshops were cancelled due to no enrollment.

⁴ CABS BOS BDT stands for Carrier Access Billing System Billing Output Specifications Bill Data Tape, which is a guideline format overseen by the Ordering and Billing Forum, an industry organization that provides standard billing guidelines.

⁵ Direct Testimony of A. Earl Hurter on Behalf of MCI Metro Access Transmission Services, Inc. dated September 25, 2000, pg 5, line 12-13. Mr Hurter also indicates in his testimony that the CABS BOS format provides "efficient bill receipt, audit and payment is predicated on a predictable, well defined electronic bill format which allows for levels of summarization by end office, jurisdiction, LATA and state". (pg 2, lines 17-19)

⁶ Of the CLECs commenting on this issue, none participated in the available training in 2002.

Bill Auditability and Dispute Resolution Plan

BearingPoint conducted extensive testing of SBC Midwest's CABS billing, evaluating the billing of recurring, non-recurring, and fractional charges as well as sums and cross totals on CABS bills. BearingPoint found that SBC exceeded the 95% benchmark for each of these categories. The BearingPoint Indiana OSS Evaluation Project Report issued on February 28, 2003 specifically evaluated recurring charges on UNE-P bills and determined that 97.5% of these charges were consistent with applicable tariff and/or contract. (See TVV9-6, at p. 1017.) Non-recurring and fractional rates on UNE-P bills were evaluated under TVV9-9 testing and the results indicated 97.9 % of the rates were consistent with applicable tariff and/or contracts. (See p. 1018)

B. Billing Dispute Resolution

SBC's billing claims and adjustments process begins with the Local Service Center ("LSC") Claims/Dispute organization, which is responsible for processing CLEC billing claims and disputes. SBC's billing claim dispute resolution process is documented on CLEC Online and references the escalation procedures available to a CLEC dissatisfied with the disposition of its claim.⁷ If the CLEC is still dissatisfied after the escalation process is complete, it can enter into the Informal Dispute Resolution ("IDR") process as outlined in the CLEC's interconnection agreement.⁸ The IDR process generally begins with the Account Manager working with the CLEC to resolve the billing dispute, and then notifying the LSC of the resolution. If the CLEC is still not satisfied with the resolution, escalation procedures are generally provided for in the IDR process to bring the issue to SBC senior management. A CLEC that does not have an interconnection agreement at the time of the billing dispute would also use its account manager to escalate and resolve billing disputes.

BearingPoint conducted comprehensive testing of SBC Midwest's support of CLEC billing related claims and inquiries. Testing included documentation reviews, interviews with SBC personnel and on-site observations of help desk operations. BearingPoint found that the billing support process clearly included procedures for accepting, acknowledging, investigating, tracking, and closing CLEC claims, issues, and inquiries. (See PPR10-3 through PPR10-5, pp. 681-684)

3. Actions

A. CABS Billing Auditability

SBC will take or has already taken the following actions to address the CLEC concerns regarding billing auditability. When a CLEC raises a bill auditability issue, SBC will:

⁷ Go to <https://clec.sbc.com/clec>, click on CLEC Handbook, choose a state's handbook i.e. Indiana, and then select Billing from the menu provided on the left side of the screen.

⁸ Go to <https://clec.sbc.com/clec>, click on Getting Started as a CLEC, choose Account Management Responsibilities, and then select Dispute Resolution under the General Responsibilities heading.

Bill Auditability and Dispute Resolution Plan

First, confirm that the CLEC is familiar with the support that is available -

- When contacted, SBC account managers will advise CLECs interested in modifications to the CABS BOS standards (e.g. call flows, interconnection agreement pricing schedules, tariff page references, additions) to submit their business need to the OBF.
- SBC Midwest Account Managers will remind their clients, as appropriate, of the ongoing availability and value in attending the SBC CLEC billing workshops.

Second, clarify with the CLEC the specifics of its concerns -

- Given the nonspecific nature of the Bill Auditability comments submitted in Michigan by many of the CLECs, the issue was a discussion item at the April 2, 2003 SBC Midwest CLEC User Forum
- At that forum, SBC extended to the CLEC community, an invitation to schedule on an individual basis, a working session with SBC to discuss company specific billing auditability concerns.

Third, identify additional available support options -

- SBC investigated the availability of bill auditability training sessions offered by external vendors and presented the results of that investigation at the April 2, 2003 Midwest CLEC User Forum.
- SBC evaluated the need to develop a CABS billing overview presentation to be delivered during a SBC Midwest CLEC User forum. The issue was discussed at the March 19, 2003 and April 2, 2003 Midwest CLEC User Forums, respectively and the CLEC consensus was that a CABS overview is not required at this time.
- SBC assessed the viability of posting limited industry documentation and provided the findings at the April 2, 2003 Midwest CLEC User Forum.
- SBC has developed USOC reference guides as follows
 - A USOC reference guide mapping USOCs to the multi-state generic interconnection agreement was developed and presented at the April 2, 2003 SBC Midwest CLEC User Forum.⁹ On an ongoing basis, CLEC interconnection agreement USOC mapping requests should be provided to, and will be handled through, the specific CLEC's account manager.
 - A USOC reference guide for Tariff IURC No. 20, Part 19 (UNEs) and

⁹ Go to <https://clec.sbc.com/clec/> Click on INTERCONNECTION AGREEMENTS, followed by Multi-state Interconnection Agreement. Under Multi-state Interconnection Agreement, click on Agreement Next is the Multi-State Generic Interconnection/Resale Agreement page - click on "[here](#)" in the 3rd paragraph of "Click [here](#) to view and/or download the Interconnection Agreement." At the Multi-State Generic Interconnection Agreement page scroll down to the State Specific pricing to be viewed. Click on IN Pricing Schedule UNE to view the new Indiana specific UNE Price Schedule with USOCs.

Bill Auditability and Dispute Resolution Plan

Tariff IURC No. 20, Part 23 (Interconnection/Collocation) was developed and documented on CLEC Online as of July 1, 2003.¹⁰

- The review of the existing complement of CLEC workshops and Operation Support System classes is an ongoing activity. The review of the CLEC Billing Workshop, along with related course material updates was completed on June 30, 2003.
- SBC will evaluate the feasibility of other training delivery methods. Evaluation will be completed by September 30, 2003.

B. Billing Dispute Resolution

SBC will take the following actions to address the Dispute Resolution Process concerns raised.

The following actions will be taken to improve the CLECs' understanding of the billing dispute resolution process.

- Managers from the LSC's Claims/Dispute Resolution organization were scheduled to provide an overview of the claim submission process at the February 2003 SBC Midwest CLEC User Forum meeting. During that forum, the CLECs indicated they understood the claim process and preferred to discuss more specific bill dispute issues. A subcommittee, with representation from the various impacted SBC organizations and the CLECs, was created to address claims/dispute related issues; the subcommittee's first call took place on March 5, 2003. The subcommittee is expected to continue to meet periodically into the second quarter, with evaluation of continuation made at that time.
- When contacted, the Account Management teams will work with the LSC to schedule CLEC specific meetings to address their billing claim issues.

The following SBC internal training and documentation improvements have been implemented to improve the quality of the billing dispute resolution process.¹¹

- The LSC Billing representative initial training course was updated to address the gaps identified by the CLEC comments (i.e. stress process and communication with the CLEC, UNE-P product knowledge). Classroom exercises were incorporated to ensure sufficient practice occurs and mastery testing is complete.
- Training for existing Billing Service Representatives was developed to reinforce product understanding, highlight the importance of proper status with the customer and detailed claim responses, and review most common systems used for their

¹⁰ Go to <https://clec.sbc.com/clec/>. Click on INTERCONNECTION AGREEMENTS, choose Multistate Interconnection Agreement and click on Agreement. On the Multi-State Generic Interconnection/Resale Agreement page under Resources, click on the link in Tariff USOC Reference Guides, then arrow down to the State specific section of the Tariff to be viewed.

¹¹ See Z-Tel November 5, 2002 Comments on Three Months of Ameritech Performance Results at pp.6-8. Similar comments are made in the Transcript of November 25, 2002 MPSC Public Hearing on 271 Matters; see T5968-T5969

Bill Auditability and Dispute Resolution Plan

segment. Development of the training was completed on 3/31/03. Training sessions began in April and are scheduled to be completed in July 2003.

- This is an interactive session that allows students to take time for hands-on practice.
- At the conclusion of the training, the participants are given a mastery test.
- A Claim/Dispute resolution checklist was developed and implemented with the claim/dispute service representatives on February 19, 2003. This checklist enables the service representative to perform the claim process steps in a methodical manner ensuring that every step is covered. The checklist includes direction for the service representative to include reference information, such as IN, repair ticket number, and/or interconnection agreement or tariff reference as appropriate. The checklist will continue to be updated going forward based on internal review and CLEC feedback.
- SBC Midwest developed and implemented an internal quality review process to perform a random sampling of processed claims to ensure accuracy and completeness; the sampling will be from actual claims made and products covered will be dependent upon claims submitted. The process was implemented on March 3, 2003.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status
Bill Auditability Support Actions			
Clarify the Issue(s)			
• Schedule issue for future CLEC User Forum agenda schedule for high level discussion	2/20/03	2/21/03	Completed
• Conduct CLEC forum discussion	4/2/02	4/2/02	Completed
• Identify External Bill Audit Training & Documentation			
• Identify external CABS BOS/BST training sources	1/27/03	3/31/03	Completed
• Identify external industry documentation and publications	1/27/03	3/31/03	Completed
• Update CLEC Online w/findings (if applicable)	3/3/03	3/31/03	Not Applicable
• Provide read-out on findings at CLEC user forum	4/2/02	4/2/02	Completed
• CLEC Training's review/update of CLEC Billing Workshop	2/17/03	6/30/03	Completed
• Explore alternate delivery of CLEC training	4/1/03	9/30/03	In Progress
• Evaluate need for CABS billing overview presentation	3/4/03	4/2/03	Completed
• Develop USOC reference guides			
• Develop a USOC to multi-state generic ICA reference guide	3/10/03	4/2/03	Completed
• Present USOC to ICA reference guide at CLEC User Forum	4/2/03	4/2/03	Completed

Bill Auditability and Dispute Resolution Plan

Task	Begin	End	Status
<ul style="list-style-type: none"> Develop a USOC to Tariff IURC No 20 Part 19 (UNEs) and Tariff IURC. No 20, Part 23 (Interconnection/Collocation) reference guide 	6/2/03	7/1/03	Completed
Dispute Resolution Process Improvements			
<ul style="list-style-type: none"> Claim Submission Process Overview Presentation at CUF 	2/10/03	2/19/03	Closed
<ul style="list-style-type: none"> Work with Billing Subcommittee formed during CUF and report progress to MPSC & IURC 	3/5/03	TBD	In Progress
<ul style="list-style-type: none"> Provide immediate team coaching at core meeting, team meeting & January & February Segment meetings on importance of complete/accurate dispute disposition responses 	12/19/02	2/28/03	Completed
<ul style="list-style-type: none"> Identify additional process improvements via weekly LSC segment meetings 	1/29/03	Ongoing	Ongoing
<ul style="list-style-type: none"> Design and implement a Billing Claim/Dispute response checklist and provide training to all Billing Claim/Dispute Service Representatives. <ul style="list-style-type: none"> Determine and assign resource to lead checklist development Develop checklist for SR to use when processing claims Conduct Training Implement Checklist revisions 	1/27/03	1/27/03	Completed
	1/27/03	2/14/03	Completed
	2/17/03	2/18/03	Completed
	3/21/03	4/7/03	Completed
<ul style="list-style-type: none"> Develop and implement a quality review process for validating the completeness of CLEC billing claim resolution responses <ul style="list-style-type: none"> Develop Service Rep validation scorecard Conduct validation sampling process 	2/10/03	2/28/03	Completed
	3/3/03	Ongoing	Ongoing
<ul style="list-style-type: none"> Develop and deliver enhanced training to all Billing Claim/Dispute Service Representatives. <ul style="list-style-type: none"> Determine and assign resource to lead development effort Produce training package Create training schedule Conduct Training 	02/03/03	3/31/03	Completed
	02/03/03	03/31/03	Completed
	03/14/03	03/31/03	Completed
	April 2003	7/31/03	In Progress

4. Status Reporting

SBC will file a report regarding its progress on this plan to the Commission for its review and serve a copy of the report on the parties of record in IURC Cause No. 41657 in July and October 2003. These quarterly reports will address status of both bill auditability and billing dispute resolution. SBC will file interim reports should significant changes or improvements occur of which the MPSC and IURC should be advised. Specifically, with respect to bill auditability, SBC will provide a status of the SBC and externally available training options available for CABS, LSB and RBS that have been communicated to

Bill Auditability and Dispute Resolution Plan

CLECs during the period under review. With respect to USOC support materials, SBC will report on its analysis of the appropriate approach to providing such information, as well as its progress. With respect to billing dispute resolution, SBC will summarize the status of the CLEC User Forum sub-committee addressing this issue during the period under review. This status will include progress related to the on-going discussion on how to measure time frames for dispute resolution, as well as which time frames to incorporate into the dispute resolution performance measure currently under discussion in the performance measure six-month review. SBC will provide status of training provided to the LSC representatives responsible for resolution of billing disputes during the period under review. SBC will provide results of the quarterly quality assurance review programs described above during the period under review. Where applicable, details on deviations and corresponding corrective actions will be provided including any additional on-going training needs identified.



IURC Cause No. 41657

**Special and UNE Circuit Repair
Coding Accuracy Plan**

July 11, 2003

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JUL 11 2003

**INDIANA UTILITY REGULATORY COMMISSION
TELECOMMUNICATIONS DIVISION**

Repair Coding Accuracy Plan

TABLE OF CONTENTS

1. PURPOSE..... 1

2. ISSUE DEFINITION..... 1

3. ROOT CAUSE ANALYSIS..... 2

4. ACTIONS 3

5. THIRD PARTY EXAMINATION APPROACH 8

Repair Coding Accuracy Plan

1. Purpose

The purpose of this plan is to describe the actions the Indiana Bell Telephone Company ("SBC" or "SBC Indiana") proposes to take to further improve accuracy and completeness¹ of closeout codes upon repair completion for Special Circuits and Unbundled Network Elements (UNEs).

The Michigan plan² (upon which this Indiana plan is based) was developed pursuant to the Michigan Public Service Commission's ("MPSC's") Order issued January 13, 2003, in Case No. U-12320 (SBC's §271 Checklist Compliance Docket) as a result of extensive discussion with MPSC staff and CLEC Industry Collaborative.³ SBC has retained BearingPoint to evaluate SBC's implementation of this plan. On March 26, 2003 the MPSC approved this plan as submitted with minor modifications on March 13, 2003. Final modifications were made to this plan in compliance with the MPSC's Order issued March 26, 2003 and resubmitted to the MPSC on April 2, 2003.

The only difference between the repair coding accuracy plans submitted for Michigan and Indiana is the scope of the management review activities underway in each of the affected work centers. In Michigan, the reviews include closeout codes applied to trouble reports for both Special and UNE circuits. This is appropriate since coding accuracy for Special and UNE circuits did not pass BearingPoint's test requirements. In Indiana, however, only the Special circuits failed to pass the BearingPoint test. As such, the management reviews in Indiana are limited to the coding applied to Special circuits. Most other activity described below, including the documentation updates and the awareness and training sessions, have and will continue to be applicable to all circuit categories.

2. Issue Definition

BearingPoint, Inc. (f/k/a KPMG Consulting) first issued Exception 131 as part of the Third-Party Operations Support Systems ("OSS") testing on June 27, 2002. In its report, BearingPoint stated that in reviewing trouble reports and close out code data, it determined that SBC had failed to meet a 95% accuracy benchmark for trouble ticket closure coding for Special circuits. The initial exception report for Indiana had included benchmark failures for Resale, UNE and Special circuits. In the course of resolving this issue, BearingPoint completed a retest of repair coding accuracy in December 2002 and reported that while Resale and UNE circuits had passed their test requirements, Special Circuits had not. This exception encompassed all five Midwest states. BearingPoint's February 28, 2003 Indiana OSS Evaluation Project Report found that test criteria

¹ AT&T stated, "accuracy is equally important as completeness." See, 11/15/02 Connolly Affidavit filed with the MPSC, p. 36, para 83

² The Michigan Plan included UNEs due to Michigan Bell not passing the BearingPoint test for this product set. In the Indiana BearingPoint test, SBC Indiana passed this test and therefore it is not specifically included in this plan.

³ The MPSC ordered the implementation of this plan to further improve SBC's repair coding accuracy. The MPSC was clear, however, that the plans were not required to demonstrate that SBC was "... in compliance with each of the Section 271 competitive checklist items, including each of the areas addressed by the modified compliance and improvement plans." (MPSC Order, March 26, 2003, Case No. U-12320, page 2.)

Repair Coding Accuracy Plan

for TVV7-14 (p. 1002) was “not satisfied.” Within the five Midwest states, Resale coding has successfully closed in all five states, the UNE coding has successfully closed in four states (i.e., Illinois, Indiana, Ohio and Wisconsin) and Special coding remains unsatisfied in Illinois, Indiana, Michigan and Ohio. Wisconsin has successfully completed Special circuit coding retesting.

In response to BearingPoint’s evaluation, SBC has identified areas for improvement and implemented a number of corrective measures, which as summarized above, have improved the performance results in those states where the retest was conducted after those corrective measures were implemented. In its final retest in Indiana, BearingPoint reported that 88.6% (31/35) of Special circuit closeouts were coded correctly. It should be noted that these coding results were in parity with retail coding and that SBC successfully passed BearingPoint testing on trouble repair itself, thus indicating that SBC provides nondiscriminatory access to its maintenance and repair (“M&R”) systems and services

3. Root Cause Analysis

Trouble tickets are closed out by the repairing technician in the field or in the central office, either directly or through the Overall Control Center (“OCO”) which encompasses the Local Operations Center (“LOC”) and the Customer Service Bureau (“CSB”) for UNE troubles, and the Special Services Center (“SSC”), for Special circuits. When the repair is complete, the technician also enters the appropriate closure codes to the ticket. The closeout code faults reported by BearingPoint within this exception appeared to fall into one of the following general situations:

- 1) Situations in which a fault inserted by BearingPoint were subsequently reported as “No Trouble Found” (NTF) by SBC.
- 2) Situations in which the fault inserted by BearingPoint on the network side of the circuit were subsequently reported as being within the customer-owned portion of the circuit and for which CLEC billing was applied.
- 3) Situations the same as Item #2 above, but no CLEC billing was applied.
- 4) Situations in which the fault inserted by BearingPoint on the network side of the circuit was properly repaired, but the coding used did not accurately identify exactly where the fault had occurred.

Very few of the items in Situation #1 above involved cases in which SBC clearly miscoded the actual trouble cause and repair. Most of the cases involved situations in which BearingPoint had inserted multiple faults in the same test bed area for several test circuits. While dispatched to repair the fault on one circuit, the technician noticed faults placed on several additional circuits⁴ and repaired them as well. The technician corrected the multiple faults but did not document the work performed on those additional circuits that needed repair, but were not listed on the trouble ticket for the test circuit. Therefore, when dispatches were made on the reported failures of the additional circuits, the dispatched technician appropriately closed the report as “NTF”.

For items that fell within Situation #2 and #3, some of the errors appear to have been caused by a lack of attention to, or unfamiliarity with, the meaning of each disposition code. Others were

⁴ Usually jumpers opened and laid back on the Main Distributing Frame (MDF) in the Central Office.

Repair Coding Accuracy Plan

similar to Situation #1 described above. These involved situations whereby the problem was cleared prior to dispatch. However, instead of listing the cause as "NTF", the technician assumed that an intermittent fault may reside within the CPE portion of the circuit. Similarly, the items found to fall into Situation #4 appear to be mostly due to errors by the repair technician or maintenance administrator. These types of closeout errors had no impact on overall billing/performance error rate because they mostly involved incorrect coding of the location in the SBC network that the fault was corrected.

Accordingly, with the exception of Situation # 1, the root cause for incorrect close out codes was repair technician error, either in the field, the central office or by the LOC Maintenance Administrators ("MAs") and the Special Service technicians.

4. Actions

The internal improvement plan originally proposed by SBC in Michigan in 2002 was constructed to address the accuracy of trouble ticket closure coding for various types of trouble conditions found including troubles noted as "No Trouble Found" ("NTF") and Customer Premises Equipment ("CPE"). The plan included many of the steps identified in this plan.

In Michigan, the MPSC in its January 13, 2003 Order directed that an independent third party verify the results achieved from this plan. It also directed SBC to include evaluation criteria by which the third party could measure whether the corrective actions resulted in improved coding accuracy. As such, the plan now includes third-party verification. The plan has also been enhanced to address specific concerns raised by certain parties in the Michigan proceeding that the plan would be eliminated as soon as SBC received 271 authorization, that there was no mechanism in place to measure performance over the long term and that training and review sessions should continue over the next three years.

The following activities identify the steps that SBC has taken for UNE, Resale and Specials or plans to take to improve the accuracy and completeness of trouble ticket closure coding for Special circuit repairs.

Repair Coding Accuracy Plan

Documentation Updates:

During the course of its investigation of the errors noted by BearingPoint in Exception 131, SBC has initiated a number of improvements in the documentation available to technicians and their managers on proper coding techniques and application. These improvements include:

- The SBC document that is used as a reference for Cause Codes was updated to clarify use of Cause Code 600 in late June 2002. Cause Code 600 is used to identify those situations where SBC is unable to determine what caused a particular case of trouble. This documentation gap was identified via a number of cited trouble tickets for both Special and UNE circuits. The updates to the documentation provided a clearer description of the process currently followed by SBC technicians and addressed questions raised by BearingPoint. The updated SBC document was provided to BearingPoint for review on August 1, 2002.
- Local Operations Center Job Aid JA-27B has been updated to reflect additional steps for Maintenance Administrators to take that will improve coding accuracy when a mechanized loop test ("MLT") indicates "Open Out"⁵ following a circuit retest. MAs and managing supervisors responsible for the accurate coding of closed trouble tickets in the LOC were covered on this process enhancement between August 1 and August 9, 2002.
- SBC updated internal Methods and Procedures ("M&P") documentation (SBC 660-169-013) used to define accurate disposition coding of trouble tickets to include new disposition codes and clarify the use of existing disposition codes. Updates to the M&P were completed on August 16, 2002. These updates also generated the following outputs:
 - Installation and Repair (I&R) internal Job Aid (JA 170 - August 20) was updated to reflect the M&P changes/clarifications.
 - Awareness sessions were conducted 8/23/02 through 11/05/02 to review updated procedures.
 - A LOC "Flash" (02RC49) was issued 8/26/02 to reflect the new disposition codes.
 - The CSB Handbook was updated 8/26/02 to reflect the new disposition codes.
 - Issued a CSB "Flash" to notify CSB personnel of updated handbook procedures.
- December 16, 2002 Central Office Technician method and procedure documentation (SBC 002-216-298) was issued for documenting corrective maintenance trouble tickets in central offices (COs). A requirement for performing quality checks on coding has also been incorporated into the frame management document SBC 002-531-045 ("CO Managers Frame Reference Guide – AIT Region").

⁵ "Open out" condition on a MLT means a circuit trouble is testing beyond the SBC Central Office.

Repair Coding Accuracy Plan

Training Review Sessions:

SBC has conducted comprehensive awareness and training sessions with personnel in each of the four work groups involved in trouble ticket closures. In those states where BearingPoint testing continued beyond the date(s) when such sessions were completed, test results indicated marked improvement in coding performance. These sessions included:

- SBC conducted training review sessions (a/k/a awareness sessions) to reinforce current procedures used for the close out of Cable Multiple tickets when wholesale account trouble tickets are attached to the lead cable trouble ticket number. Sessions covering all I&R Operations Center personnel were completed by August 13, 2002. A "Cable Multiple" ticket number is assigned to a damaged cable or cable failure that potentially impacts service to multiple subscribers served by the same cable. Individual subscriber (or CLEC) reports of service interruptions having individually assigned trouble ticket numbers may become attached to the lead or Multiple Cable Trouble Ticket Number ("CTTN"). SBC was made aware that in at least two audited instances, individual wholesale trouble reports attached to a Cable Trouble Ticket Number were closed as the CTTN closed and were not "detached" and tested to confirm restoration of the reported trouble. Reinforcement of current procedures to detach individual case trouble tickets from the CTTN and retest with the CLEC was completed for I & R Operations Center employees through Awareness Sessions conducted between August 8 and August 15, 2002.
- SBC conducted awareness sessions to reinforce current procedures used for the disposition coding of trouble reports closed when multiple faults are found on the same telephone line.
 - Sessions covering Installation and Repair field technicians in all manager groups were completed by August 12, 2002.
 - Additional training sessions with I&R personnel were conducted in November 2002.
- Additional review sessions for LOC personnel were conducted to reinforce accurate trouble closure procedures were completed by November 10, 2002.
- Review training sessions were conducted with Special Service Center personnel to reinforce correct trouble ticket coding procedures. These review sessions were completed by November 25, 2002.
- Review sessions were conducted through January 31, 2003 with SBC Midwest Central Office technicians in Michigan, Ohio, Indiana and Illinois⁶ manager groups to review the newly created Methods and Procedures for documenting trouble tickets and established procedures for proper trouble ticket coding.

⁶ Since Wisconsin passed, trouble ticket coding these review sessions were not conducted.

Repair Coding Accuracy Plan

- A coding refresher review session will be conducted within each of the four work groups (i.e., Special Services Center and Central Office) within one year of the training sessions described above.
- Training packages for new technicians in all work centers already contain trouble disposition and coding and will continue to be part of the training program.

Management Review Activities

To verify that the improvements to documentation and the training/awareness sessions have had the desired affect (i.e., improvement in coding performance), SBC is conducting its own internal reviews of Special circuit trouble ticket closures in both of the work groups involved. These reviews, which will be conducted over the next three years, focus both on closeout coding in general, as well as specific problems brought to the attention of SBC by individual CLECs (e.g., NTFs). These reviews include:

1) Special Services Center

- To monitor the accuracy and completeness of trouble ticket coding, trouble ticket coding review has been incorporated into the regularly scheduled quality control measures utilized by the Special Services management. This effort began December 2002.

2) Central Office

- Beginning in March 2003, a monthly sample of closed CLEC trouble tickets in Indiana will be reviewed for narrative and coding accuracy.

In addition to these targeted coding review sessions SBC has incorporated trouble ticket coding into its internal ISO audits which are conducted approximately every three months within the various work centers. If significant ticket coding problems are identified during these ongoing audits, SBC will initiate new training/awareness sessions with the groups involved.

SBC acknowledges that the CLEC "original source information" (as was noted by AT&T in the Illinois 271 proceeding) is not available in the above-cited improvement measures. However, SBC believes that these measures will improve the accuracy of trouble ticket coding based on the types of errors noted by BearingPoint in the test. This improvement will be demonstrated through the Third Party evaluation.

Repair Coding Accuracy Plan

The following provides the timelines and current status of each of the items contained in the actions noted above:

	Task	Begin	End	Status
1.	Update documentation for Cause Code 600	06/01/02	06/30/02	Complete
2.	Update LOC Job Aid JA-27B	07/31/02	08/01/02	Complete
	A. Conduct Job Aid Training	08/01/02	08/09/02	Complete
3.	Develop "awareness" training and conduct sessions with Installation & Repair Operations Center personnel to review procedures for "Cable Multiple" trouble tickets	08/01/02	08/08/02	Complete
	A. Conduct "Awareness" sessions	08/08/02	08/15/02	Complete
4.	Develop awareness training for I&R personnel to reinforce coding of trouble tickets when multiple faults are on the same line	08/10/02	08/11/02	Complete
	A. Conduct awareness sessions	08/11/02	08/12/02	Complete
5.	Update Methods and Procedures to include two new disposition codes and clarifications of existing codes.			
	A. I&R internal job aids were updated to reflect M&P changes/clarification	08/20/02	08/30/02	Complete
	B. Conduct I&R awareness sessions to review updated job aids	08/23/02	11/05/02	Complete
	C. Issue LOC "Flash" to advise of new disposition codes	08/26/02	08/26/02	Complete
	D. Issue CSB "Flash" to advise of handbook updates with new disposition codes	08/26/02	08/26/03	Complete
6.	Update Central Office M&P for trouble ticket closure			
	A. Conduct review sessions with Central Office technicians	12/17/02	1/31/03	Complete
	B. Initiate internal reviews of closed CLEC trouble tickets	03/01/03	04/01/06	Ongoing
7.	Conduct review training sessions with Special Service Center personnel	11/20/02	11/25/02	Complete
8.	Incorporate quality reviews of trouble tickets into current Special Service Center quality control measures	12/01/02	04/01/06	Ongoing
9.	Expected start of BearingPoint testing ⁷	07/01/03		
10.	Conduct refresher review session with the Central Office and Special Service Center work centers	08/01/03	12/01/03	

⁷ BearingPoint may elect to affirm SBC's documentation improvements and internal reviews prior to this date.

5. Third Party Examination Approach

This plan will be evaluated by a third party. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include a process evaluation and a review of actual commercial transactions as follows:

- The third party will evaluate SBC's implementations of the actions described in the "Actions" section of this plan which pertain to Special Circuit Trouble Ticket Coding by reviewing documents, conducting interviews, and performing site visits, as deemed necessary by the third party. This evaluation will include a review of SBC's quality review results.
- The third party will report on coding accuracy and completeness by comparing the trouble ticket coding applied to actual troubles found Special Circuits to the narrative contained in the trouble report using a nonbiased sample from commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC and the Illinois Commerce Commission (ICC) staff prior to its implementation. BearingPoint began its analysis of commercial production transactions in early July, 2003 with a final report pursuant to BearingPoint's project plan. The accuracy and completeness of closure codes for Special Circuit repairs is expected to improve the level of accuracy as reported by BearingPoint with test results of 88.6% for Special Circuits⁸. If the third party evaluation does not show an improvement for Special circuits has been achieved, any further required actions will be determined by the IURC.
- SBC will file bimonthly third party reports until final process and transactions reports are completed. The first bimonthly report, covering the April-May 2003 activity period, was filed on June 16, 2003. These reports will be filed with the IURC by the 15th of the following month and served on the parties of record for IURC Cause No. 41657.

6. Additional Reporting

SBC will provide quarterly reports for three years to the IURC of the results of ongoing management activities, along with its assessment of whether the results indicate that further refresher training is appropriate or has been conducted. For each of the work centers involved, the reports will include the following information:

- 1) the quantity of tickets reviewed;

⁸ See BearingPoint Exception 131, Disposition Report, December 20, 2002

Repair Coding Accuracy Plan

- 2) percent or quantity found accurate;
- 3) follow-up activities taken (if needed).

Although the management reviews in Indiana will be limited to trouble ticket closures on Special circuits, SBC will provide the IURC with the results of the management reviews of UNE circuit trouble ticket closures in Michigan as well.



IURC Cause No. 41657

Change Management Communications Plan

July 11, 2003

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INDIANA UTILITY REGULATORY COMMISSION
TELECOMMUNICATIONS DIVISION

Change Management Communications Plan

TABLE OF CONTENTS

1. PURPOSE.....	1
2. ISSUE DEFINITION.....	1
3. ROOT CAUSE ANALYSIS.....	3
4. ACTIONS	3
A. NEW EDITS FOR EXISTING BUSINESS RULES (PRE-ORDER AND ORDER).....	4
B. MODIFICATIONS TO EXISTING EDITS FOR EXISTING BUSINESS RULES (PRE-ORDER AND ORDER)	4
C. EDI MAPPING AND CORBA IDL CHANGES	5
D. THIRD PARTY INFORMATION TO BE PROVIDED BY SBC TO CLECS	5
E. CLEC PROFILE	5
F. CURRENT DEFECT TESTING	6
G. INTERNAL TRAINING AND AWARENESS SESSIONS.....	6
H. QUALITY ASSURANCE REVIEW PROGRAM	7
5. STATUS REPORTING.....	9

Change Management Communications Plan

1. Purpose

The purpose of this plan is to describe action the Indiana Bell Telephone Company ("SBC" or "SBC Indiana") has taken and will take to improve its 13-State Change Management process of Operational Support Systems (CMP). This plan was developed to facilitate communicating system changes that occur between releases to the CLEC community. More specifically, it addresses changes to the pre-order and order interfaces.

The Michigan Plan (upon which this Indiana plan is based) was developed pursuant to the Michigan Public Service Commission's (MPSC's) Order issued January 15, 2003, in Case No. U-12320 (SBC's §271 Checklist Compliance Docket) as result of extensive discussion with MPSC staff and CLEC Industry Collaborative. On March 26, 2003 the MPSC approved this plan as submitted on March 13, 2003.¹

This change management communications plan includes process updates and quality assurance efforts that will be implemented and monitored by SBC. This plan is being implemented across the SBC Midwest region as described in this document. Therefore, there are no Indiana specific modifications or additions.

2. Issue Definition

SBC has developed, in collaboration with CLECs, and implemented a uniform change management process – the 13 State Change Management Process ("13-State CMP") pursuant to the FCC's required Uniform and Enhanced Plan of Record ("POR"). Pursuant to the Federal Communication Commission's ("FCC's") SBC/Ameritech Merger Condition 8, SBC developed and offered to the state commissions a uniform change management process – 13 State CMP. It was developed with significant Competitive Local Exchange Carriers ("CLEC") collaboration and negotiations. SBC implemented the 13-State CMP process in early 2001. This CMP was also reflected in the *Joint Report of the Participants Regarding Resolved OSS Enhancements And Process Improvements*, filed by the collaborative participants in this proceeding on December 27, 2000.

¹ While the MPSC ordered the implementation of this plan to further improve change management communications, the MPSC was clear that the plan was not required to demonstrate that SBC was "... in compliance with each of the Section 271 competitive checklist items, including each of the areas addressed by the modified compliance and improvement plans." (MPSC Order, March 26, 2003, Case No. U-12320, page 2.)

Change Management Communications Plan

BearingPoint, Inc. ("BearingPoint") conducted an exhaustive and comprehensive test of SBC's change management methods and procedures. BearingPoint found that the 13-State CMP being used by SBC provides for input from interested parties and contains clearly defined and reasonable intervals for notifying CLECs about proposed changes. BearingPoint also found that the 13-State CMP is clearly defined and documented and that related documents are accessible via CLEC OnLine. Finally, as part of the assessment of the 13-State CMP documentation, BearingPoint reviewed detailed procedures for dispute resolution.

The 13-State CMP provides guidelines for the management of changes to the OSS interfaces provided by SBC and used by CLECs in the various SBC operating regions. For example, the 13-State CMP specifies timelines to guide the development and publishing by SBC of interface specifications for periodic, scheduled "releases", or enhanced versions of the interfaces.

In addition, in order that parties may manage the modifications required between releases, the 13-State CMP provides a process for notification of these changes referred to as the Exception process. A notification to CLECs is required under the Exception process whenever a change is to be implemented by SBC will have an impact on CLECs using the interface due to a change in interface business rules that occurs outside of the quarterly release requirements Accessible Letters ("ALs"). In a specific instance described by AT&T and noted by the MPSC, SBC did not issue an Exception notification of a planned change generally due to SBC's belief there would be no impact on CLECs.

This plan will facilitate communicating system changes that occur between releases and, more specifically, for the types of changes that were the basis for the comments filed by AT&T and noted by the MPSC.

Certain changes made to SBC Midwest's OSS were implemented without announcement to the CLEC community. These changes resulted in the following error codes being encountered and were the basis for the AT&T comments:

- Error G408 (a. Invalid Trailing Data for Call Forward Busy No Answer Feature and b. Pay Per Use blocking and Custom ring feature)²
- Error L100/L101 (PIC/LPIC Change)³
- Error B103 (Additional Directory Listings issue for non- published accounts)⁴

² AT&T Comments filed 11/15/02 with the MPSC, Willard & Webber, pp. 35-37, ¶¶ 69-73; AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 23-26, ¶¶ 49-58

³ AT&T Comments filed on 12/19/02 with the MPSC. DeYoung affidavit, pp. 27-31, ¶¶ 59-67

Change Management Communications Plan

3. Root Cause Analysis

At the time that each of the above errors occurred, SBC conducted an analysis to determine the cause. Only one of the above changes, L100/101 PIC/LPIC, should have followed the Exception Process as noted in the 13-State CMP. The Exception Process is invoked in those situations where SBC needs CLEC approval to modify an existing documented business rule outside of the normal notification timelines. In such a situation, SBC would distribute an Accessible Letter ("AL"), detailing the issue and requesting CLEC concurrence with the change/modification. For the L100/101 PIC/LPIC error, SBC applied an LSOG 5 edit in the LSOG 4 version in an attempt to correct an open Defect Report ("DR") related to flow through improvement. Since the business rule was changed for version 4.02, based on the Exception Process requirements, an Exception Request AL should have been distributed to CLECs. SBC is taking corrective actions to minimize the chance of this type of mistake recurring, as explained below.

In the case of both G408 and B103 errors, SBC was not *changing* any business rules, but either *creating an edit to enforce an existing rule*, or *further tightening an edit of an existing business rule*. SBC acknowledges that notifying CLECs of these types of modifications is beneficial. Accordingly, SBC will adopt a more encompassing definition of items covered by the exceptions process in the 13-State CMP and institute procedures to send Exception Request Accessible Letters to alert CLECs of any new edits that will be implemented in support of existing business rules. SBC will also enhance its Defect Report to provide more information to CLECs regarding modifications to existing edits in support of existing business rules that will be implemented in support of an open CLEC-impacting DR.

Additionally, SBC recognizes that CLECs may appreciate additional information about SBC's third party vendors and software being used by SBC Midwest. SBC will provide these details to the CLEC community to further augment current communication and understanding of SBC Midwest OSS that may impact CLECs.

4. Actions

SBC is committed to implementing the following action plans. The actions listed below are in addition to the existing notification and communication process within the 13-State

⁴ AT&T Comments filed on 12/19/02 with the MPSC. DeYoung affidavit, p. 32, ¶¶ 70-71

Change Management Communications Plan

CMP and are intended to address CLEC-impacting changes that are made outside of the normal quarterly release cycles.⁵ For purposes of correcting defects, CLEC-impacting is defined as any change made by SBC to the interface that would cause a CLEC's previously accepted LSR to be rejected or a previously accepted pre-order transaction to fail.

a. New Edits for Existing Business Rules (Pre-Order and Order)

- SBC will notify the CLEC community via an Accessible Letter when *new edits* to existing business rules are developed and implemented for the pre-order and order interfaces.⁶ For the purpose of this plan, SBC differentiates between types of new edits.
 - For *new edits initiated by SBC* ("proactive new edit") in support of an existing business rule, SBC will issue an Exception Request AL commensurate with the 13-State CMP. SBC proposes that the Accessible Letter will be distributed 5-7 days prior to SBC's implementation. SBC will hold a conference call to discuss the edit and the implementation date.
 - For *new edits in response to a CLEC-impacting defect*, SBC will issue an Exception Request AL with the turn around time commensurate with the severity of the defect being corrected. SBC will host a conference call to discuss the edit and the implementation date.
- SBC implemented these changes effective April 21, 2003.

b. Modifications to Existing Edits for Existing Business Rules (Pre-Order and Order)

- SBC will notify the CLEC community via the Defect Report when *modifications to existing edits and/or table updates* are required to correct an open defect in the pre-order and order interfaces. The Defect Report will be updated as CLEC-impacting

⁵ SBC will continue to follow 6.2 of the 13-state Change Management Plan for Severity-1 defects, which are defined as major software problems, production system failure or an interface failure, including significant production problems, the failure of scheduled release enhancements and the failure of pre-existing functionality.

⁶ Per the IURC approved business rules, the Exception Process is excluded from performance measure MI 15; thus, the changes delineated herein will not be subject to PMs. Any changes to performance measures should be addressed in the six month reviews.

Change Management Communications Plan

defects are identified by either SBC or CLECs. Status will also be provided when the fixes have been implemented. This information will stay on the report for one week after the defect has been fixed. SBC implemented this change effective April 18, 2003.

- SBC made the following enhancements to the current DR report for the Pre-Order and Order Interfaces only:
 - DR report will be updated and posted to CLEC On-line by 5pm Pacific each business day.
 - DR Report includes details regarding fixes that require modifications to existing edits and/or table updates.
 - DR Report lists open CLEC-impacting DRs, a target date for a maintenance release once one is targeted for the specific DR, completed DRs, and identify which DRs were not completed in the maintenance release for which they were targeted.
- On Monday, April 21, 2003, an AL was issued to remind CLECs to refer to the EDR report for possible maintenance defects. SBC issued similar reminder ALs each Monday thereafter through the end of May, 2003. The AL indicated if new postings had been made to the DR report since the prior week's AL. The issue of how DR notifications would be handled was discussed in the 13-state CMP meeting held on March 20, 2003.
- At each CMP meeting, SBC will update the CLECs on recent activity and progress of the defect requests impacting the pre-order and ordering interfaces.

c. EDI Mapping and CORBA IDL Changes

SBC will send Exception Request Accessible Letters for any EDI mapping or CORBA IDL structure changes that are identified as part of a defect.

d. Third Party Information to be Provided by SBC to CLECs

SBC provided CLECs with a list of SBC's 3rd party vendors and software versions used by OSS that could impact CLEC connectivity.⁷ SBC will provide more detailed information in ALs to include when SBC changes a 3rd party vendor or when SBC changes to a newer version of the 3rd party software.

e. CLEC Profile

⁷ This list was posted on the CLEC On-line website on March 20, 2003 See Accessible Letter, CLECALLS03-031.

Change Management Communications Plan

SBC will continue to work with CLECs in the CLEC User Forum on additional improvements to the CLEC Profile process.

f. Current Defect Testing

SBC's Information Technology testing for Maintenance releases consists of:

- Positive Testing - testing of the specific issue/defect that has been identified. Recreation of the events that led to defect are repeated to validate the fix has corrected the specific issues or problem identified.
- Regression Testing - testing performed to ensure the change/fix associated with a given defect has no adverse impact.

Accountability is mandated for all staff and management that participate in the testing of fixes. The Industry Markets organization reviews the IT testing process to ensure thorough testing is performed. SBC has developed and enforces a more stringent audit trail for these changes. This audit trail will improve the comprehensive, accurate, and timely creation and maintenance of testing documentation. At a minimum, the following rigors are being implemented:

- Test plans, scenarios, and expected outcomes are reviewed and approved by IT management.
- Testing results (including re-testing) as documented by the IT testing team are reviewed by Industry Markets prior to implementation to production.
- SBC has and will continue to reinforce the criticality of rigorous testing and also educate the OSS Application Support teams and Industry Markets on these accountability/audit requirements.

g. Internal Training and Awareness Sessions

- An internal informative document including the following items is being provided to the OSS Application teams:
 - Guidance regarding how to improve system change evaluations made between releases;
 - Review of the types of changes (i.e. modifications to existing edits) that must be posted online;
 - Introduction to the enhanced DR report, its new required details (as outlined above) and procedures for posting and maintaining the report;
 - Overview of the purpose of the Exception Process and when to invoke it;

Change Management Communications Plan

- Clarification that new edits to existing business rules are now subject to follow the Exception Process; and
- Overview of the importance of adhering to the 13-State CMP when making changes to business rules and system requirements.
- This internal informative document further clarifies which system changes may impact the CLECs. The document focuses on improving the existing evaluation process for system changes between quarterly releases. SBC has and continues to communicate this document to the OSS Support and System Application teams (including: OSS Customer Support, OSS Design and Support, CLEC Forums and Regulatory Support, and Information Technology teams) who are responsible for the execution of this plan.
- SBC recognizes that edits which change/modify an existing LSOR business rule should go through the 13-State CMP including the Exception Process. SBC will continue to re-emphasize the importance of thorough analysis of the existing LSOR and LSPOR to minimize the times an edit change from one version is inadvertently carried over to other versions. The L100/L101 error (PIC/LPIC Change) cited by AT&T was the result of modifying an existing documented business rule.⁸
- SBC will continue to reinforce the need to use proper outage notification process for situations where a system does not turn up as planned. The H325 error (More Telephone Numbers than on Account is the example) was a result of a system not coming up as planned.⁹ In the future, these failed turn ups will be handled through the normal outage notification process. For planned outages, SBC will continue to communicate to the CLEC community using the existing maintenance window schedule process.

h. Quality Assurance Review Program

SBC has developed and will implement an internal quality assurance review program to verify completeness and accuracy of the implementation of the action plans. Specifically, SBC will implement the following items:

- SBC management has reviewed and approved the above described action plans so that the action plan elements are integrated into daily operations and management.

⁸ AT&T Comments filed on 12/19/02 with the MPSC, DeYoung affidavit, pp. 27-31, ¶¶ 59-67

⁹ AT&T Comments filed on 12/19/02 with the MPSC, DeYoung affidavit, pp. 31-32, ¶¶ 68-69

Change Management Communications Plan

- SBC will design and conduct a quality assurance review to monitor adherence to the action plan objectives. A "Quality Assurance Review Program" will be documented. It will provide the detailed methods and procedures for conducting the quarterly quality reviews. The review program will include sampling procedures for each of the changes made between releases and action plans listed above.
- Reviews will be conducted on a quarterly basis for one year. The reviews will be performed according to the methods and procedures defined in the "Quality Assurance Review Program." Work papers will be documented and maintained. At the completion of the review, the results will be documented and reported to business and executive management.
- Issues identified during quality assurance reviews will be documented, tracked and investigated. Corrective actions will be taken as warranted. All such issues will be reported to business and executive management.

The following table provides the schedule for the actions discussed in this section:

Task	Begin Date	End Date	Status
SBC develops informative document <ul style="list-style-type: none"> • Determine and assign lead • Create informative document • Determine communication method • Management reviews and approves document 	3/10/03	3/31/03	Complete
SBC communicates informative document to OSS Application teams.	4/1/03	4/18/03	Complete
SBC implements plan details (as described above). <ul style="list-style-type: none"> • New edits follow Exception Process • Edit modification are treated as DR • EDI mapping/CORBA DLI structure changes follow Exception Process 	4/21/03	4/21/03	Complete
Enhanced DR Report is created and posted.	3/10/03	4/18/03	Complete
SBC develops M&Ps for rigorous testing including additional audit trail requirements.	3/10/03	4/18/03	Complete
Documentation templates to be used for audit trail during testing are developed and approved by IT and Industry Markets.	3/13/03	4/18/03	Complete
SBC provides list of 3 rd party vendors and software versions (as detailed above).	2/3/03	3/20/03	Complete
SBC designs quarterly quality assurance	3/13/03	4/18/03	Complete

Change Management Communications Plan

review program.			
SBC executes daily oversight and enforcement by local managers.	3/13/03	On going	-----
SBC executes quarterly assurance reviews.	4/30/03 ¹⁰	On going	-----
SBC performs root cause analysis (if deviations were identified in quality reviews)	4/30/03	Ongoing	-----
<ul style="list-style-type: none"> • Develop tracking process • Determine and assign resource(s) • Adopt corrective actions • Report results to management 			

5. Status Reporting

SBC will file a quarterly report regarding its progress on this plan to the Indiana Utility Regulatory Commission ("IURC") for its review through June, 2004; SBC will serve a copy on the parties of record for IURC Cause No. 41657. Specifically, with respect to actions 4(a), 4(b), and 4(c) SBC will initially confirm that it has implemented the described procedures. SBC will also provide a DR Report and a list of exception requests that have been communicated to CLECs during the period under review. With respect to action 4(d), SBC will confirm that it has provided the additional information. With respect to actions 4(f) and 4(g), SBC will initially summarize the status of the described documentation and training. With respect to action 4(h), SBC will provide summarized results on the quarterly quality assurance review programs.¹¹ Where applicable, details on deviations and corresponding corrective actions will be provided. The processes discussed above has been brought before all CLECs in the 13-State Change Management Process for further discussion as some of these processes could have the effect of slowing down the implementation of fixes. Any agreed upon modifications will be provided to the IURC.

¹⁰ Reflects beginning of first period to be reviewed; review periods are between quarterly releases.

¹¹ The CMP Communications Plan approved by the MPSC on March 26, 2003 referenced actions 4(e), 4(f), and 4(g). The plan should have referenced actions 4(f), 4(g), and 4(h).